

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

OCCIDENTAL OF ELK HILLS, INC. - WESTERN LIGHT OIL

FINAL ENGINEERING EVALUATION

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Occidental — Western Light Oil

Facility #: S-382

Project #: 970330

ATTACHMENT I--PSD PERMIT

Title V Application Review

Light Oil Production

Project #: 970330

Deemed Complete: May 30, 1997

Engineer: Douglas Shaffer

Date: May 2, 2001

Facility Number: S-382

Facility Name: Occidental of Elk Hills, Inc. - Western Light Oil

Mailing Address: PO Box 1001

Tupman, CA 93276

Contact Name: Dennis J. Champion, PE

Phone: (661) 763-6068

Responsible Official: Don Romine

Title: General Manager

I. PROPOSAL

Occidental of Elk Hills, Inc. (Occidental) is proposing that the initial Title V Operating Permit be issued for its existing Western Light Oil source located in Kern County. The purpose of this engineering evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

The source is located west of Interstate Highway 5 in Kern County, California.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit templates:

A. SJV-UM-0-0 Facility-Wide Umbrella

The applicant has requested to utilize template SJV-UM-0-0, Umbrella General Permit Template, for the entire facility. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

B. SJV-GS-1-0 Series 1 Gasoline Transfer - Storage and Dispensing Systems Equipped with Phase I and II Vapor Recovery

The applicant has requested to utilize template SJV-GS-1-0 Series 1 Gasoline Transfer... for units -156 and -157. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

C. SJV-BSG-17-0 Series 17 Boilers, Steam Generators and Process Heaters

The applicant has requested to utilize template SJV-BSG-17-0, Series 17 Boilers, Steam Generators and Process Heaters, for units -69, -71, and -675 through -681. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

D. SJV-TK-4-0 Series 4 Tanks

The applicant has requested to utilize template SJV-TK-4-0, Series 4 Tanks, for units -76 through -123, -128 through -134, -136 through -143, -145, -147, -150, -151, -158 through -160, -163, -167 through -181, -183 through -212, -215, -216, -218 through -224, -226, -227, -228, -230, -231, -232, -234, -237, -239, -240, -242 through -244, -246, -247, -249 through -251, -253, -254, -256, -257, -260 through -264, -266 through -285, -287 through -290, -293 through -296, -299 through -315, -320 through -328, -330, -366, -399, -400, -402, -403, -574, -575 and -597. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

Based upon information contained in the current District permits, permit units -147 and -163 do not qualify to use this Permit Template.

E. SJV-TK-18-0 Series 18 Tanks

The applicant has requested to utilize template SJV-TK-18-0, Series 18 Tanks, for units -334 through -365, and -367 through -379. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

Based upon information contained in the current District permits, units -334 through -365 and -367 through -379 do not qualify to use this Permit Template.

F. SJV-FG-1-0 Series 1 Fugitive Emissions

The applicant has requested to utilize template SJV-FG-1-0, Series 1 Fugitive Emissions, for units -29 and -75. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

G. SJV-IC-3-0 Series 3 Internal Combustion Engines

The applicant has requested to utilize template SJV-IC-3-0, Series 3 Internal Combustion Engines for the following units: -32, -62, -63, -416, -418, -419, -421, -422, -425, -429, -433, -435, -447, -455, -461, -463, -464, -468, -478, -490, -494 through -498, -501, -506, -510, -523, -525, -532, -545, -548, -550 through -553, -561, -562, -584, -588, -670, -671 and -672. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. **SCOPE OF EPA AND PUBLIC REVIEW**

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for the model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA and public review:

- Conditions 1 through 39 of the facility wide requirements (S-382-0)
- Conditions 42 through 62 of the facility wide requirements (S-382-0)
- Conditions 1 through 9 of the requirements for permit units S-382-32, -62, -63, -416, -418, -419, -421, -422, -425, -429, -433, -435, -447, -455, -461, -463, -464, -468, -478, -490, -494 through -498, -501, -506, -510, -523, -525, -532, -545, -548, -550 through -553, -561, -562, -584, -588, -670, -671 and -672
- Conditions 1 through 14 of the requirements for permit units S-382-69, -71, and -675 through -681
- Conditions 1 through 20 of the requirements for permit units S-382-76 through -109, -111 through -123, -128 through -134, -136 through -143, -145, -150, -151, -156 through -160, -167 through -181, -183 through -212, -215, -216, -218 through -224, -226, -227, -228, -230, -231, -232, -234, -237, -239, -240, -242 through -244, -246, -247, -249 through -251, -253, -254, -256, -257, -260 through -264, -266 through -285, -287, -288, -290, -293 through -295, -296, -299 through -315, -320 through -328, -330, -366, -399, -400, -402, -403, -574, -575 and -597
- Conditions 1 through 19 of the requirements for permit unit S-382-110

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1081 Source Sampling (Amended December 16, 1993) ¹ (Non SIP replacement for Kern County Rule 108.1)

District Rule 1100 Equipment Breakdown (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 111) ²

District Rule 1160 Emission Statements (Adopted November 18, 1992, 1992) ²

District Rule 2010 Permits Required (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 201) ²

¹ Model General Permit Templates SJV-BSG-17-0 addressed this requirement only for the units identified in Section IV, Part C.

² The Umbrella General Permit Template addressed these requirements for all permit units at this facility.

District Rule 2020 Exemptions (Amended July 21, 1994) (Non SIP replacement for Kern County Rule 202)²

District Rule 2031 Transfer of Permits (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 203)²

District Rule 2040 Applications (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 204)²

District Rule 2070 Standards for Granting Applications (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 208)²

District Rule 2080 Conditional Approval (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 209)²

District Rule 2520 - Federally Mandated Operating Permits, Sections 9.5.1, 9.5.2, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0 (Adopted June 15, 1995)²

District Rule 2520 Federally Mandated Operating Permits, Sections 9.1, 9.4.2, 9.5.2, 13.2 (Adopted June 15, 1995)³

District Rule 4101 - Visible Emissions (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 401)²

District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 404)^{4, 5}

District Rule 4301 Fuel Burning Equipment (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 408)⁴

District Rule 4403 Components Serving Light Crude Oil or Gases at Light Crude Oil and Gas Production Facilities and Components at Natural Gas Processing Facilities (Amended February 16, 1995)⁶

District Rule 4601 - Architectural Coatings (Amended 12/17/92)²

² The Umbrella General Permit Template addressed these requirements for all permit units at this facility.

³ Model General Permit Templates SJV-BSG-17-0, SJV-FG-1-0, SJV-GS-1-0, SJV-TK-4-0, SJV-TK-18-0 and SJV-IC-3-0 addressed this requirement only for the units identified in Section IV, Parts C, F, B, D, E and G, respectively.

⁴ Model General Permit Template SJV-BSG-17-0 addressed this requirement only for the units identified in Section IV, Part C.

⁵ Model General Permit Template SJV-IC-3-0 addressed this requirement only for the units identified in Section IV, Part G.

⁶ Model General Permit Template SJV-FG-1-0 addressed this requirement only for the units identified in Section IV, Part F.

District Rule 4621 Gasoline Transfer into Stationary Storage Containers, Delivery Vessels and Bulk Plants (amended May 20, 1993) ⁷

District Rule 4622 Transfer of Gasoline into Vehicle Fuel Tanks (amended February 17, 1994) ⁷

District Rule 4623 Storage of Organic Liquids (Amended December 17, 1992) ⁸

District Rule 4801 Sulfur Compounds (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 407) ^{4, 5}

District Rule 8020 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Construction, Demolition, Excavation, and Extraction Activities (Amended April 25, 1996) ²

District Rule 8030 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Handling and Storage of Bulk Materials (Amended April 25, 1996) ²

District Rule 8060 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Paved and Unpaved Roads (Amended April 25, 1996) ²

40 CFR Part 61 Subpart M National Emission Standard for Asbestos ²

40 CFR Part 82 Subpart F Stratospheric Ozone ²

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District New and Modified Stationary Source Review Rule

District Rule 2520 Federally Mandated Operating Permits - section 9.4.2 (Adopted June 15, 1995) ⁹

² The Umbrella General Permit Template addressed these requirements for all permit units at this facility.

⁴ Model General Permit Template SJV-BSG-17-0 addressed this requirement only for the units identified in Section IV, Part C.

⁵ Model General Permit Template SJV-IC-3-0 addressed this requirement only for the units identified in Section IV, Part G.

⁷ Model General Permit Template SJV-GS-1-0 addressed this requirement only for the units identified in Section IV, Part B.

⁸ Model General Permit Templates SJV-GS-1-0, SJV-TK-4-0 and SJV-TK-18-0 addressed this requirement only for the units identified in Section IV, Parts B, D and E, respectively.

District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 404) ^{12,13}

District Rule 4301 Fuel Burning Equipment (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 408) ^{12,13}

District Rule 4403 Components Serving Light Crude Oil or Gases at Light Crude Oil and Gas Production Facilities and Components at Natural Gas Processing Facilities (Amended February 16, 1995) ¹⁰

District Rule 4623 Storage of Organic Liquids (Amended December 17, 1992) ¹¹

District Rule 4624 Organic Liquid Loading (Amended December 17, 1992)

District Rule 4801 Sulfur Compounds (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 407) ^{12,13}

40 CFR Part 52 Subpart A Prevention of Significant Deterioration of Air Quality

40 CFR Part 60 Subpart A General Provisions

40 CFR 60, Subpart Ka Standards of Performance for Storage Vessels for Petroleum Liquids...

40 CFR 60, Subpart Kb Standards of Performance for Storage Vessels for Petroleum Liquids...

40 CFR 63, Subpart HH National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements.

⁹ Model General Permit Templates SJV-BSG-17-0, SJV-FG-1-0, SJV-GS-1-0, SJV-TK-4-0 and SJV-TK-18-0 addressed this requirement only for the units identified in Section IV, Parts C, F, B, D and E, respectively.

¹⁰ Model General Permit Template SJV-FG-1-0 addressed this requirement only for the units identified in Section IV, Part F.

¹¹ Model General Permit Templates SJV-GS-1-0, SJV-TK-4-0 and SJV-TK-18-0 addressed this requirement only for the units identified in Section IV, Parts B, D and E, respectively.

¹² Model General Permit Template SJV-BSG-17-0 addressed this requirement only for the units identified in Section IV, Part C.

¹³ Model General Permit Template SJV-IC-3-0 addressed this requirement only for the units identified in Section IV, Part G.

The District-only requirements are not a part of the Title V Operating Permit. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through the Title V Permit".

The facility is subject to the following District rules and requirements that are not currently Federally Enforceable:

- District Rule 4102 - Nuisance
- District Rule 4305 - Boilers, Steam Generators and Process Heaters
- District Rule 4403 - Components Serving Light Crude Oil or Gases at Light Crude Oil and Gas Production Facilities and Components at Natural Gas Processing Facilities

For this facility: condition 26 of the requirements for permit unit -91, conditions 16 through 20 of the requirements for permit unit -675; conditions 16 through 19 of the requirements for permit unit -676; conditions 15 through 19 of the requirements for permit units -677 through -681; and condition 40 of the facility wide requirements are based on the rules identified above and are not Federally Enforceable Through the Title V Permit.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements (S-382-0) as condition numbers 1 through 39 to assure compliance with these requirements.

2. Gasoline Dispensing

The applicant is proposing to use a general permit template to address federally applicable requirements for the gasoline dispensing units. Section IV of template SJV-GS-1-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the requirements for permit units -156 and -157 as condition numbers 1 through 20 to assure compliance with these requirements.

3. Boilers

The applicant is proposing to use a general permit template to address federally applicable requirements for the boilers. Section IV of template SJV-BSG-17-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the requirements for permit units -69, -71 and -675 through -681 as condition numbers 1 through 14 to assure compliance with these requirements.

Due to more stringent conditions on the existing Permits To Operate (PTOs) S-382-69, -71, and -675 through -681, general permit template conditions 6, 11, 12 and 13 have been streamlined in, and general permit template conditions 5, 10 and 14 have been deleted from the requirements for permit units.

4. Tanks

The applicant is proposing to use a general permit template to address federally applicable requirements for some of the tanks. Section IV of template SJV-TK-4-0 includes a demonstration of compliance for all applicable requirements. Template conditions 1 through 20 have been added to the requirements for permit units S-382-76 through -109, -111 through -123, -128 through -134, -136 through -143, -145, -150, -151, -158 through -160, -167 through -181, -183, -184 through -212, -215, -216, -218, -219 through -224, -226, -227, -228, -230, -231, -232, -234, -237, -239, -240, -242 through -244, -246, -247, -249 through -251, -253, -254, -256, -257, -260 through -264, -266 through -285, -287, -288, -290, -293 through -295, -296, -299 through -315, -320 through -328, -330, -366, -399, -400, -402, -403, -574, -575 and -597 to assure compliance with these requirements. Template conditions 1 through 19 have been added to the requirements for permit unit S-382-110 to assure compliance with these requirements.

Due to more stringent conditions on the existing Permit to Operate (PTO) S-382-110, general permit template condition 11 has been streamlined in, and general permit template condition 1 has been deleted from the requirements for permit units.

Due to more stringent conditions on the existing Permits to Operate (PTOs) S-382-81, -123, -159 and -597, general permit template condition 11 has been streamlined in the requirements for permit units.

Due to more stringent conditions on the existing Permits to Operate (PTOs) S-382-261, -262, -366 and -403, general permit template conditions 1 and 11 have been streamlined in the requirements for these permit units.

5. Oilfield Fugitive Sources

The applicant is proposing to use a general permit template to address federally applicable requirements for the oilfield fugitive sources. Section IV of template SJV-FG-1-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements (S-382-0) as condition numbers 42 through 62 to assure compliance with these requirements.

6. Internal Combustion Engines

The applicant is proposing to use a general permit template to address federally applicable requirements for some of the internal combustion engines. Section IV of template SJV-IC-3-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the requirements for permit units -32, -62, -63, -416, -418, -419, -421, -422, -425, -429, -433, -435, -447, -455, -461, -463, -464, -468, -478, -490, -494 through -498, -501, -506, -510, -523, -525, -532, -545, -548, -550 through -553, -561, -562, -584, -588, -670, -671 and -672 as condition numbers 1 through 9 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

1. New and Modified Stationary Source Review Rule (District NSR Rule)

a. Tank (S-382-1)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 15 from the PTO assured compliance with District Rule 4623 and were included as conditions 1 through 41 of the requirements for this permit unit.

b. Loading Rack (S-382-7)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide permit. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 5, and 9 from the PTO specified proper operational conditions and limitations pursuant to the District NSR Rule and were included as conditions 19 through 22 and 24 of the requirements for this permit unit.
- Condition 6 from the PTO was included as condition 8 of the requirements for this permit unit.
- Condition 7 from the PTO was included as condition 6 of the requirements for this permit unit.
- Condition 8 from the PTO specified record keeping requirements pursuant to District Rule 2520 and was included as condition 23 of the requirements for this permit unit.

c. Compressor (S-382-29)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 3 from the PTO specified proper operational conditions and limitations pursuant to the District NSR Rule and were included as conditions 1 through 3 of the requirements for this permit unit.

d. Internal Combustion Engine (S-382-32)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide permit. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, 6, and 7 from the PTO specified proper operational conditions and limitations pursuant to the District NSR Rule and were included as conditions 10, 11, 13, and 14 of the requirements for this permit unit.
- Condition 4 from the PTO assured compliance with District Rule 1081 and was included as condition 12 of the requirements for this permit unit.
- Condition 5 from the PTO, requiring compliance demonstration, has been subsumed by permit template conditions 4 and 6.

e. Internal Combustion Engines (S-382-62, -63)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide permit. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, 4, 7, and 8 from the PTO specified proper operational conditions and limitations pursuant to the District NSR Rule and were included as conditions 10, 11, 12, 14, and 15 of the requirements for these permit units.
- Condition 5 from the PTO assured compliance with District Rule 1081 and was included as condition 13 of the requirements for these permit units.
- Condition 6 from the PTO, requiring compliance demonstration, has been subsumed by permit template conditions 4 and 6.

f. Gas Lift Systems (S-382-68, -70)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10,

1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 9 from the PTO provided operational requirements and was included as condition 1 through 9 of the requirements for these permit units.

g. Glycol Reboilers (S-382-69 and -71)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 from the PTO provided fuel sulfur limits and daily emissions limits and were included as conditions 15 and 16 of the requirements for these permit units.

h. Flare (S-382-74)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 8 of the requirements for this permit unit.

i. Liquid Trap (S-382-75)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, and 3 from the PTO provided operational requirements and limitations and were included as conditions 1, 2, and 3 of the requirements for this permit unit.

j. Tanks (S-382-76 through -79, -82, -83, -84, -86, -87, -90)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, and 3 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21, 22, and 23 of the requirements for these permit units.
- Condition 4 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for these permit units.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.

k. Tanks (S-382-80, -81, -85, -88, -89, -93)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 12 and 15 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21, 22, 26 and 27 of the requirements for these permit units.
- Conditions 3, 4 and 5 from the PTO provide exemptions of District Rule 4403 and have been included as conditions 23, 24 and 25 of the requirements for these permit units. .
- Conditions 6, 7, 8, 9, 10, 11 and 13 from the PTO assured compliance with District Rule 4403 and have been subsumed by general permit template conditions 42 through 62 of the facility wide requirements.
- Conditions 14, 16 and 17 from the PTO assured compliance with District Rule 4623 and have been subsumed by general permit template conditions 2 through 17 of the requirements for these permit units.

l. Tank (S-382-91)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 13, 15 and 17 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21, 22, 27, 28 and 29 of the requirements for this permit unit.
- Conditions 3, 4 and 5 from the PTO provide exemptions of District Rule 4403 and have been included as conditions 23, 24 and 25 of the requirements for this permit unit.
- Conditions 6, 8 through 12, 14, 16, 18 and 19 from the PTO assured compliance with District Rules 4403 and 4623 and have been subsumed by general permit template conditions 2 through 17 of the requirements for this permit unit.
- Condition 7 from the PTO was included as condition 26 of the requirements for this permit unit.

m. Tanks (S-382-92, -94 through -106)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, and 4 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21, 22, and 23 of the requirements for these permit units.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for these permit units.
- Condition 6 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.

n. Tank (S-382-107)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July

10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 and 6 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21 through 25 of the requirements for this permit unit.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for this permit unit.
- Condition 7 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for this permit unit.
- Condition 8 from the PTO required compliance with the applicable requirements of District Rule 4403 and has been subsumed by general permit template conditions 4 through 10 of the requirements for this permit unit.

o. Tank (S-382-108)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 5 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21 through 24 of the requirements for this permit unit.
- Condition 6 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for this permit unit.
- Condition 7 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for this permit unit.

p. Tank (S-382-109)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 5, 7, and 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 26 of the requirements for this permit unit.
- Condition 6 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.

q. Tank (S-382-110)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 3, 4, 5, 7 through 11, and 13 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 20 through 29 of the requirements for this permit unit.
- Condition 2 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 6 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 1 and 2 of the requirements for this permit unit.
- Condition 12 from the PTO assured compliance with District Rule 4623 and has been incorporated into general permit template condition 10 of the requirements for this permit unit.

r. Tank (S-382-111)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 4, and 6 through 10 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21 through 28 of the requirements for this permit unit.
- Condition 3 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.

s. Tanks (S-382-112, -113)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.
- Conditions 3, 4, and 5 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21, 22, and 23 of the requirements for this permit unit.

t. Tanks (S-382-114 through -119, -121, -122, -268 through -285)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, 5, 6 and 7 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21 through 25 of the requirements for this permit unit.
- Condition 4 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.

u. Tank (S-382-120)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 4, 5 and 6 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21 through 25 of the requirements for this permit unit.
- Condition 3 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.

v. Tank (S-382-123)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 3, 4, 14 and 16 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21 through 25 of the requirements for this permit unit.
- Conditions 5, 6 and 7 from the PTO provide exemptions of District Rule 4403 and have been included as conditions 27, 28 and 29.
- Conditions 8 through 13, 15, 17, 18 and 19 from the PTO assured compliance with District Rules 4403 and 4623 and have been subsumed by general permit template conditions 2 through 17 of the requirements for this permit unit.

w. Tank (S-382-124)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, and 6 through 9 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 25 of the requirements for this permit unit.
- Conditions 2 through 5 from the PTO assured compliance with District Rule 4623. These conditions have been rewritten as conditions 1, 2, 3, 11, and 12 of the requirements for this permit unit.

x. Tank (S-382-127)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 3, 5, 6, 7, 9, and 11 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 31 through 37 of the requirements for this permit unit.
- Condition 2 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the

California Health and Safety Code rather than a federally applicable requirement.

- Condition 4 from the PTO assured compliance with District Rule 4623 and was included as condition 3 of the requirements for this permit unit.
- Condition 8 from the PTO assured compliance with District Rule 4623 and was subsumed by condition 23 of the requirements for this permit unit.
- Condition 10 from the PTO assured compliance with 40 CFR 60, Subpart Kb and was replaced by more detailed compliance conditions for this federal requirement (conditions 1 through 27).

y. Tank (S-382-128)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 3, 4, 7, and 9 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 26 of the requirements for these permit units.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for these permit units.
- Condition 6 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.

z. Tanks (S-382-129, -130, -133, -230)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5, 8 and 10 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 27 of the requirements for this permit unit.

- Condition 6 from the PTO assured compliance with District Rule 4623 and has been included as condition 11 of the requirements for this permit unit.
- Condition 7 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.
- Condition 9 from the PTO was replaced, by more detailed compliance conditions for District Rule 4403, as conditions 42 through 60 of the facility-wide requirements.

aa. Tank (S-382-131)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 3, 6, 8, 9, 10, 11 and 13 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 29 of the requirements for this permit unit.
- Condition 4 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for this permit unit.
- Condition 7 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template condition 1 of the requirements for this permit unit.
- Condition 12 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for this permit unit.

bb. Tank (S-382-132)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July

10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5, 15, 17, 18 and 19 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21 through 25, and 29 through 32 of the requirements for this permit unit.
- Conditions 6, 7 and 8 from the PTO provide exemptions of District Rule 4403 and have been included as conditions 26, 27 and 28 of the requirements for this permit unit.
- Conditions 9 through 14 and 16 from the PTO assured compliance with District Rule 4403 and have been subsumed by general permit template conditions 42 through 62 of the facility wide requirements.
- Condition 20 from the PTO assured compliance with District Rule 4623 and has been included as general permit template condition 11 of the requirements for this permit unit.
- Condition 21 from the PTO has been included as template condition 9 of the facility wide requirements.

cc. Tank (S-382-134)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 8, 15, 18, 20, 21 and 22 from the PTO provided operational requirements pursuant to District NSR Rule and were included as conditions 21 through 28, and 32 through 35 of the requirements for this permit unit.
- Conditions 9, 10 and 11 from the PTO provide exemptions of District Rule 4403 and have been included as conditions 26, 27 and 28 of the requirements for this permit unit.
- Conditions 12 through 17 and 19 from the PTO assured compliance with District Rule 4403 and have been subsumed by general permit template conditions 42 through 62 of the facility wide requirements.
- Condition 23 from the PTO assured compliance with District Rule 4623 and has been included as general permit template condition 11 of the requirements for this permit unit.
- Condition 24 from the PTO has been included as template condition 9 of the facility wide requirements.

dd. Tank (S-382-136)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 4, 6, and 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 25 of the requirements for this permit unit.
- Condition 3 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for this permit unit.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template condition 1 of the requirements for this permit unit.
- Condition 7 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for this permit unit.

ee. Tank (S-382-137)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 3, 6, 8, and 10 from the PTO provided operational requirements and limits pursuant to District NSR Rule (including equipment descriptions) and were included as conditions 21 through 26 of the requirements for this permit unit.
- Condition 4 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for this permit unit.
- Condition 7 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template condition 1 of the requirements for this permit unit.

- Condition 9 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for this permit unit.

ff. Tanks (S-382-138, -139)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 5, 7, 8, 9, and 11 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 27 of the requirements for these permit units.
- Condition 3 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 4 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.
- Condition 6 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template condition 1 of the requirements for these permit units.
- Condition 10 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for these permit units.

gg. Tanks (S-382-140, -141, -143, -145)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 4, 6, 7, 8, and 10 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 26 of the requirements for these permit units.

- Condition 2 was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 3 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template condition 1 of the requirements for these permit units.
- Condition 9 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for these permit units.

hh. Tank (S-382-142)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 4, 6 through 9, and 11 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 27 of the requirements for this permit unit.
- Condition 2 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 3 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for this permit unit.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template condition 1 of the requirements for this permit unit.
- Condition 10 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for this permit unit.

ii. Tank (S-382-147)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, and 5 through 9 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 20 through 25 of the requirements for this permit unit.
- Condition 3 from the PTO assured compliance with District Rule 4623 and has been subsumed by conditions 1 and 2 of the requirements for this permit unit.
- Condition 4 from the PTO assured compliance with District Rule 4623 and has been subsumed by conditions 10 and 11 of the requirements for this permit unit.

jj. Tank (S-382-148)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO assured compliance with District Rule 4623 and was included as condition 1 of the requirements for this permit unit. Due to NSR condition, daily records of throughput must be maintained.
- Conditions 3, 4, 5, and 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 2, 3, 4, and 6 of the requirements for this permit unit.

- Condition 6 from the PTO assured compliance with District Rule 4623 and was included as condition 5 of the requirements for this permit unit.
- Condition 7 from the PTO assured compliance with District Rule 4403 and was redefined more specifically as conditions 44 through 56 of the Facility Wide Requirements (S-382-0).

kk. Tank (S-382-150)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 3 through 10, 12 through 15, and 17 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 34 of the requirements for this permit unit.
- Condition 2 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 11 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for this permit unit.
- Condition 16 from the PTO has been subsumed by general permit template condition 17 of the requirements for this permit unit.

ll. Tank (S-382-151)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.

- Conditions 2 through 9, 11 through 14, and 16 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 33 of the requirements for this permit unit.
- Condition 10 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for this permit unit.
- Condition 15 from the PTO has been subsumed by general permit template condition 17 of the requirements for this permit unit.

mm. Gasoline Dispensing (S-382-156 and -157)

These permit units were not subject to the District NSR Rule at the time they were installed. The units were issued In-house Permits to Operate (PTO) as existing equipment. The units required to be permitted when the District Rule 2020 exemption levels changed.

nn. Tank (S-382-158)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 9, 12, 13, and 14 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 31 of the requirements for this permit unit.
- Condition 10 from the PTO assured compliance with District Rule 4403 and has been redefined by more detailed compliance conditions for District Rule 4403 as conditions 42 through 62 of the Facility Wide Requirements (S-382-0).
- Condition 11 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 1, 2, and 3 of the requirements for this permit unit.

oo. Tanks (S-382-159, -160)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, 4, 6, 7, 8 and 10 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 27 of the requirements for these permit units.
- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2 and 3 of the requirements for these permit units.
- Condition 9 from the PTO provided operational requirements and limits pursuant to District NSR Rule and was incorporated into condition 11 of the requirements for these permit units.

pp. Tank (S-382-161)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 14, and 17 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 15 of the requirements for this permit unit.
- Condition 15 from the PTO was replaced, by more detailed compliance conditions for District Rule 4403 as conditions 42 through 62 of the Facility Wide Requirements (S-382-0).
- Condition 16 from the PTO assured compliance with District Rule 4623 and was rewritten to be more specific in condition 35 of the requirements for this permit unit.

qq. Tank (S-382-162)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 13, and 16 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 13 of the requirements for this permit unit.
- Condition 14 from the PTO was replaced, by more detailed compliance conditions for District Rule 4403, as conditions 42 through 62 of the Facility Wide Requirements (S-382-0).
- Condition 15 from the PTO assured compliance with District Rule 4623 and was rewritten to be more specific in condition 33 of the requirements for this permit unit.

rr. Tank (S-382-163)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, 4, 7 through 14, and 17 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 31 of the requirements for this permit unit.
- Conditions 5, and 6 from the PTO assured compliance with District Rule 4623 and have been subsumed by permit conditions 2 and 3 of the requirements for these permit units.

- Condition 15 from the PTO was replaced by more detailed compliance conditions for District Rule 4403 as conditions 42 through 62 of the Facility Wide Requirements (S-382-0).
- Condition 16 from the PTO provided operational requirements and limits pursuant to District NSR Rule and was included as condition 11 of the requirements for this permit unit.

ss. Tanks (S-382-167 through -181, -183 through -210)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO provided operational requirements and limits pursuant to District NSR Rule and was included as condition 21 of the requirements for these permit units.
- Condition 3 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for these permit units.
- Condition 4 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2, and 3 of the requirements for these permit units.

tt. Tank (S-382-182)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.

- Conditions 2 and 4 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 and 3 of the requirements for this permit unit.
- Condition 3 from the PTO assured compliance with District Rule 4623 and was included as condition 2 of the requirements for this permit unit.

uu. Tanks (S-382-211, -212)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 5 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 24 of the requirements for this permit unit.
- Condition 6 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 11 and 12 of the requirements for these permit units.
- Condition 7 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2, and 3 of the requirements for these permit units.

vv. Tank (S-382-213)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.

- Conditions 2 through 6 and 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 6 of the requirements for this permit unit.
- Condition 7 from the PTO assured compliance with District Rule 4623 and was rewritten to be more specific in condition 7 of the requirements for this permit unit.

ww. Tanks (S-382-214, -217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 9 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 8 of the requirements for these permit units.

xx. Tanks (S-382-215, -216, -219, -220, -223, -224, -227, -228, -231, -232, -237, -239, -240, -242, -243, -244, -246, -247, -249, -250, -251, -253, -254, -256, -257, -260)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.

- Conditions 2 through 5, 7, and 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 26 of the requirements for these permit units.
- Condition 6 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2, and 3 of the requirements for these permit units.

yy. Tanks (S-382-218, -221, -222, -226, -234)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 6, 8, and 9 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 27 of the requirements for this permit unit.
- Condition 7 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2, and 3 of the requirements for these permit units.

zz. Tanks (S-382-261, -262)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, 4, 6, 7, 8, 10 and 12 from the PTO provided operational requirements and limits pursuant to District NSR Rule

and were included as conditions 21 through 28 of the requirements for these permit units.

- Condition 5 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2, and 3 of the requirements for these permit units.
- Condition 9 from the PTO provided operational requirements and limits pursuant to District Rules 4623 and NSR and was included as condition 1 of the requirements for these permit units.
- Condition 11 from the PTO provided record keeping requirements pursuant to District Rules 4623 and NSR and was included as condition 11 of the requirements for these permit units.

aaa. Tanks (S-382-263, -264, -265)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 and 4 through 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 26 of the requirements for this permit unit.
- Condition 3 from the PTO assured compliance with District Rule 4623 and has been subsumed by general permit template conditions 2, and 3 of the requirements for these permit units.

bbb. Tanks (S-382-266, -267)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the

California Health and Safety Code rather than a federally applicable requirement.

- Condition 2 from the PTO assured compliance with District Rule 4623. The condition was rewritten to be more specific in template conditions 2 and 3 of the requirements for this permit unit.
- Conditions 3, 4 and 5 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21, 22 and 23 of the requirements for this permit unit.

ccc. Tanks (S-382-286 through -302, -320 through -323, -399, -400)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, 4 and 6 from the PTO assured compliance with District Rule 4623. The conditions were rewritten to be more specific in conditions 1, 2, 3 and 11 of the requirements for this permit unit.
- Conditions 5 and 7 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 and 22 of the requirements for this permit unit.

ddd. Tanks (S-382-303, -304)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.

- Conditions 2, 4 and 7 from the PTO assured compliance with District Rule 4623 and were addressed in model general permit template conditions 2, 3 and 11.
- Conditions 3, 5, 6, and 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 24 of the requirements for these permit units.

eee. Tanks (S-382-305 through -308)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 4 and 9 from the PTO assured compliance with District Rule 4623 and were addressed in model general permit template conditions 2, 3 and 11.
- Conditions 3, 5, 6, 7, 8, and 10 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 26 of the requirements for these permit units.

fff. Tanks (S-382-309, -310)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 3 and 8 from the PTO assured compliance with District Rule 4623 and were addressed in model general permit template conditions 2, 3 and 11.
- Conditions 2, 4 through 7, and 9 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 26 of the requirements for these permit units.

ggg. Tanks (S-382-311 through -315, -324 through -328, -330)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 3 and 7 from the PTO assured compliance with District Rule 4623 and were addressed in model general permit template conditions 2, 3 and 11.
- Conditions 2, 4, 5, 6 and 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 25 of the requirements for these permit units.

hhh. Tank (S-382-334)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 and 3 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 11 and 12 of the requirements for this permit unit.
- Condition 4 from the PTO assured compliance with District Rule 4623 and was included as condition 4 of the requirements for this permit unit.
- Condition 5 from the PTO assured compliance with District Rule 4623 and was addressed in conditions 13 through 21.

iii. Tanks (S-382-335, -336, -337, -339 through -365)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July

10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 4 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 11 and 12 of the requirements for these permit units.
- Condition 2 from the PTO assured compliance with District Rule 4623 and was included as condition 4 of the requirements for this permit unit.
- Condition 3 from the PTO assured compliance with District Rule 4623 and was addressed in conditions 13 through 21.

jjj. Tank (S-382-338)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO provided operational requirements and limits pursuant to District NSR Rule and was included as condition 11 of the requirements for this permit unit.
- Condition 3 from the PTO assured compliance with District Rule 4623 and was included as condition 4 of the requirements for this permit unit.
- Condition 4 from the PTO assured compliance with District Rule 4623 and was addressed in conditions 12 through 20.

kkk. Tank (S-382-366)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the

California Health and Safety Code rather than a federally applicable requirement.

- Conditions 2, 3, 4, 6, 7, 8, 10 and 12 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 28 of the requirements for this permit unit.
- Condition 5 from the PTO assured compliance with District Rule 4623 and was addressed in model general permit template condition 2.
- Condition 9 from the PTO assured compliance with District Rules 4623 and NSR and was included in condition 1 of the requirements for this permit unit.
- Condition 11 from the PTO assured compliance with District Rules 4623 and NSR and was included in condition 11 of the requirements for this permit unit.

III. Tank (S-382-367)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO assured compliance with District Rule 4623 and was addressed in conditions 14 through 22.
- Conditions 3, 4 and 5 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 11, 12 and 13 of the requirements for this permit unit.

mmm. Tanks (S-382-368 through -379)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, 4, 6, 7 and 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 11 through 16 of the requirements for these permit units.
- Condition 5 from the PTO assured compliance with District Rule 4623 and was addressed in conditions 19 through 27.

nnn. Tank (S-382-380)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5 and 7 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 11 through 16 of the requirements for this permit unit.
- Condition 6 from the PTO assured compliance with District Rule 4623 and was addressed in condition 4 of the requirements for this permit unit.

ooo. Tanks (S-382-381 through -384, -386 through -392)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 and 4 from the PTO assured compliance with District Rule 4623 and were addressed in conditions 19 through 27.

- Conditions 3, 5 through 8, and 10 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 13 through 18 of the requirements for these permit units.
- Condition 9 from the PTO assured compliance with District Rule 4623 and was addressed in condition 5 of the requirements for these permit units.

ppp. Tank (S-382-385)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 9 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 8 of the requirements for this permit unit.

qqq. Tank (S-382-398)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 5, and 7 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 5 of the requirements for this permit unit.

- Condition 6 from the PTO assured compliance with District Rule 4623. The condition was rewritten to be more specific in condition 6 of the requirements for this permit unit.

rrr. Tank (S-382-401)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- The equipment description referenced a deleted permit unit; this reference is therefore obsolete. The equipment description has been updated to remove the reference and to include the actual additional components.
- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO assured compliance with District Rule 4623. The condition was rewritten to be more specific in condition 2 of the requirements for this permit unit.
- Condition 3 from the PTO provided operational limits pursuant to District NSR Rule and was included as condition 1 of the requirements for these permit units. This condition referenced a deleted permit unit; this reference is therefore obsolete. The condition has been updated to remove the reference and to include the actual emission limit.

sss. Tank (S-382-402)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the

California Health and Safety Code rather than a federally applicable requirement.

- Conditions 2 through 5, 7 and 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 26 of the requirements for these permit units.
- Condition 6 from the PTO assured compliance with District Rule 4623 and was addressed in model general permit template conditions 2 and 3.

ttt. Tank (S-382-403)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 4, 5, 6, 8, 10 through 13, 15, 16, and 18 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 33 of the requirements for this permit unit.
- Condition 3 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 7, 9, 14 and 17 from the PTO assured compliance with District Rule 4623 and were addressed in model general permit template conditions 1, 2, 3, and 11.

uuu. Tanks (S-382-404 through -407)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the

California Health and Safety Code rather than a federally applicable requirement.

- Conditions 2 through 11 and 13 through 16 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 14 of the requirements for these permit units.
- Condition 12 from the PTO assured compliance with District Rule 4623 and was included as condition 20 of the requirements for these permit units.

vvv.Tank (S-382-408)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 7 of the requirements for this permit unit.

www. Flares (S-382-409, -410, -411)

These permit units were not subject to the District NSR Rule at the time they were installed. The units were issued In-house Permits to Operate (PTO) as existing equipment. The units required to be permitted when the District changed the Rule 2020 exemption levels.

xxx.Tank (S-382-412)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 7 of the requirements for this permit unit.

yyy. Internal Combustion Engines (S-382-416 through -419, -421, -422, -425, -429, -433, -435, -447, -455, -461, -463, -464, -468, -478, -490, -494, -495, -496, -497, -498, -501, -506, -510, -523, -525, -532, -545, -548, -550, -551, -552, -553, -561, -562, -584, -588)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide permit. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 and 3 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 10 and 11 of the requirements for these permit units.

zzz. Tanks (S-382-574, -575)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.

- Conditions 2 and 4 through 8 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as condition 21 through 26 of the requirements for these permit units.
- Condition 3 from the PTO assured compliance with District Rule 4623 and was addressed in model general permit template conditions 2 and 3.

aaaa. Gas Lift System (S-382-594)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 6 and 7 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 4 of the requirements for this permit unit.
- Condition 3 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 4 and 5 from the PTO assured compliance with District Rule 4403 and were replaced by more detailed compliance conditions as conditions 42 through 62 of the facility wide requirements (S382-0).

bbbb. Tank (S-382-597)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2 through 6, 9 and 11 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 21 through 27 of the requirements for these permit units.
- Condition 7 from the PTO assured compliance with District Rule 4403 and was replaced by more detailed compliance conditions as conditions 42 through 62 of the facility wide requirements (S382-0).

- Condition 8 from the PTO assured compliance with District Rule 4623 and was addressed in model general permit template conditions 2 and 3.
- Condition 10 from the PTO provided operational requirements and limits pursuant to District NSR Rule and was included in condition 11 of the requirements for this permit unit.

cccc. Loading Rack (S-382-669)

This unit was subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO was addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 9 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 9 of the requirements for this permit unit.

dddd. Natural Gas Fired Engines (S-382-670, -671, -672)

These units were subject to the District NSR Rule upon application for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide permit. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, 4, 6, 7, 8, 10 and 11 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 10 through 15, 17 and 18 of the requirements for these permit units.
- Condition 5 from the PTO assured compliance with District Rule 4403 and was replaced by more detailed compliance conditions as conditions 42 through 62 of the facility wide requirements (S382-0).
- Condition 9 from the PTO required reporting compliance pursuant to District Rule 1081 and was included as condition 16 of the requirements for these permit units.

- Condition 12 from the PTO required District notification pursuant to District Rule 2520 and was included as condition 19 of the requirements for these permit units.

eeee. Tank (S-382-673)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 40 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Conditions 2, 3, 4, 6 and 8 through 12 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 1 through 9 of the requirements for this permit unit.
- Condition 5 and 7 from the PTO assured compliance with 40 CFR 60, Subpart Kb and were replaced as more detailed compliance conditions 10, 11, 12, 15, 22 through 26, 32, 33 and 34 of the requirements for this permit unit.
- Condition 13 from the PTO provided operational requirements and limits pursuant to District NSR Rule and was included as condition 31 of the requirements for this permit unit.

ffff. Depurator (S-382-674)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2, 3, 4, 5 and 7 from the PTO provided operational requirements and limits pursuant to District NSR Rule and were included as conditions 5 through 10 of the requirements for this permit unit.
- Condition 6 from the PTO assured compliance with District Rule 4403 and was replaced by more detailed compliance conditions as conditions 42 through 62 of the facility wide requirements (S382-0).

gggg. Boiler (S-382-675)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO provided fuel sulfur limits pursuant to District NSR Rule and was included as condition 15 of the requirements for these permit units.
- Conditions 2 through 6 from the PTO were included as conditions 16 through 20 of the requirements for this permit unit. These conditions are not federally enforceable because they are based on District Rule 4305 Boilers, Steam Generators, and Process Heaters (Amended December 19, 1996) rather than a federally applicable requirement.

hhhh. Boiler (S-382-676)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO provided fuel sulfur limits pursuant to District NSR Rule and was included as condition 15 of the requirements for these permit units.
- Conditions 2 through 5 from the PTO were included as conditions 16 through 19 of the requirements for this permit unit. These conditions are not federally enforceable because they are based on District Rule 4305 Boilers, Steam Generators, and Process Heaters (Amended December 19, 1996) rather than a federally applicable requirement.

iii. Heaters (S-382-677 through -681)

These permit units were not subject to the District NSR Rule at the time they were installed. The units were issued In-house Permits to Operate (In-House PTO) as existing equipment. These units were required to be permitted when the District changed the Rule 2020 exemption levels.

2. District Rule 1081 Source Sampling (Amended December 16, 1993)

District Rule 1081 has been submitted to the EPA to replace Kern County Rule 108.1, which is SIP approved. District Rule 1081 is as stringent as Kern County Rule 108.1, as shown on Table 1.

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 of Rule 1081 set forth requirements for sampling facilities, collection of samples, test methods, test procedures, and administrative requirements, respectively.

Table 1 - Comparison of District Rule 1081 and Kern County Rule 108.1

REQUIREMENTS	1081 SJVUAPCD	108.1 KERN
Upon request of the APCO, the source shall provide info. and records to enable the APCO to determine when a representative sample can be taken.	✓	✓
The facility shall collect, have collected or allow the APCO to collect, a source sample	✓	✓
The source shall have District personnel present at a source test	✓	
The applicable test method, if not specified in the rule, shall be conducted in accordance with 40 CFR § 60, Appendix A	✓	
Test procedures: 1) arithmetic mean of three runs 2) a scheduled source test may not be discontinued solely due to the failure to meet the applicable standard(s), and 3) arithmetic mean of two runs is acceptable if circumstances beyond owner or operator control occurs.	✓	

a. Loading Rack (S-382-7)

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 are addressed in permit condition 1.

b. Internal Combustion Engine (S-382-32)

Reporting requirements are addressed in permit conditions 12 and 16.

c. Internal Combustion Engines (S-382-62, -63)

Reporting requirements are addressed in permit conditions 13 and 17.

d. Tanks (S-382-156, -157)

Reporting requirements are addressed in permit condition 21.

e. Internal Combustion Engines (S-382-670, -671, -672)

Reporting requirements are addressed in permit conditions 16 and 22.

3. District Rule 2520 Federally Mandated Operating Permits (Adopted June 15, 1995)

Section 9.1 requires each permit to include emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance.

Section 9.4.2 of the rule requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance.

Section 9.5.2 requires all records be maintained for at least five years.

District Rule 4624, Section 5.3 requires pressure of the vapor collection and control system not to exceed certain limits for water column pressure and vacuum. The District rule does not specify a test method or frequency for this work practice standard.

District Rule 4624, Section 5.4 requires there shall be no excess organic liquid drainage at disconnect, but does not specify monitoring frequency or method. This Section also requires that the loading and vapor control system be operated so there are no leaks, but does not specify a monitoring frequency or repair requirement.

a. Facility-Wide Requirements (S-382-0)

Conditions 63 and 64 require inspection of tank vapor recovery systems and tank vent valves to assure proper operation of control equipment.

b. Tank (S-382-1)

- Conditions 24 and 25 of the requirements for these permit units specify the methods for leak inspection of piping, fittings and other components.
- Condition 26 requires maintenance of an inspection log containing specific information to verify compliance.
- Condition 39 requires all records to be maintained for five years.

c. Loading Rack (S-382-7)

- Conditions 2 and 3 require all records to be maintained for five years.
- Conditions 4, 5, and 9 through 13 assure compliance with the monitoring, record keeping and reporting requirements of District Rule 4624, Section 5.4.
- Condition 16 assures compliance with the monitoring, record keeping and reporting requirements of District Rule 4624, Section 5.3.
- Condition 17 prohibits loading of a delivery vessel if its pressure relief valve opens and requires corrective action should this condition occur.
- Condition 27 requires record keeping of process information.

d. Internal Combustion Engine (S-382-32)

- Condition 15 specifies source test methods.
- Condition 26 specifies emission calculation requirements.
- Conditions 27 through 34 specify parametric monitoring requirements.

e. Internal Combustion Engines (S-382-62, -63)

- Condition 16 specifies source test methods.
- Condition 28 specifies emission calculation requirements.
- Conditions 29 through 36 specify parametric monitoring requirements.

f. Gas Lift Systems (S-382-68, -70)

- Condition 10 requires record keeping of daily throughput and that records of monitoring data and support information be maintained for at least five years.
- Condition 11 requires periodic monitoring consisting of testing to assure compliance with NSR conditions.

g. Flare (S-382-74)

- Condition 9 specifies record keeping.
- Conditions 10 through 13 assure compliance with District Rule 4801 SO_x emission limit by specifying compliance methods.
- Condition 14 requires that records of monitoring data and support information be maintained for at least five years.

h. Tanks (S-382-124, -265, -286, -289, -291, -292, -297, -298, -382)

- Conditions 4 through 9 specify the methods for leak inspection of piping, fittings and other components.
- Condition 10 requires maintenance of an inspection log containing specific information to verify compliance.
- Condition 16 requires that the vapor control system be functional at all times.
- Condition 17 requires all records to be maintained for five years.

i. Tank (S-382-127)

- Conditions 5, and 8 through 11 specify the methods for leak inspection of piping, fittings and other components.
- Condition 12 requires maintenance of an inspection log containing specific information to verify compliance.
- Condition 25 requires all records to be maintained for five years.
- Condition 27 requires that the vapor control system be functional at all times.

j. Tank (S-382-147)

- Any tank gauging or sampling device on a tank vented to a vapor recovery system shall be equipped with a gas-tight cover, which shall be closed at all times except during gauging or sampling. This is addressed in condition 1.
- All piping, valves and fittings shall be constructed and maintained in a gas tight condition. This is addressed in condition 2.

- Monitoring and record keeping supporting condition 1 are addressed in permit conditions 3 through 9.
- Additional monitoring and record keeping requirements are given in permit conditions 10 through 15.
- Condition 16 requires that all records be maintained for at least five years.
- Since this unit is served by vapor control system, additional requirements are addressed in condition 20.
- Condition 26 requires periodic monitoring consisting of testing to assure compliance with NSR conditions.

k. Tank (S-382-148)

- Condition 1 requires periodic monitoring, testing, and record keeping to support District Rule 4623.
- Condition 12 requires periodic monitoring consisting of testing to assure compliance with NSR conditions.

l. Tank (S-382-150)

Condition 35 requires periodic monitoring consisting of testing to assure compliance with NSR conditions.

m. Tank (S-382-151)

Condition 34 requires periodic monitoring consisting of testing to assure compliance with NSR conditions.

n. Tank (S-382-158)

Condition 32 requires periodic monitoring consisting of testing to assure compliance with NSR conditions.

o. Tanks (S-382-159, -160)

Condition 28 requires periodic monitoring consisting of testing to assure compliance with NSR conditions.

p. Tank (S-382-161)

- Conditions 17, 19, 21 through 25, and 42 of the requirements specify the methods for leak inspection of piping, fittings and other components.
- Condition 26 requires maintenance of an inspection log containing specific information to verify compliance.
- Condition 38 requires that the vapor control system be functional at all times.

q. Tank (S-382-162)

- Conditions 17, 19 through 23 and 40 of the requirements specify the methods for leak inspection of piping, fittings and other components.
- Condition 24 requires maintenance of an inspection log containing specific information to verify compliance.
- Condition 36 requires that the vapor control system be functional at all times.

r. Tank (S-382-163)

- Condition 2 requires that any tank gauging or sampling device on a tank vented to the vapor recovery system be equipped with a gas-tight cover. This cover shall be closed at all times except during gauging or sampling.
- Condition 3 requires that all piping, valves, and fittings be constructed and maintained in a gas tight condition.
- Monitoring and record keeping supporting condition 2 are addressed in permit conditions 4 through 10.
- Additional monitoring and record keeping requirements are given in permit conditions 11 through 16.
- Condition 17 requires that all records be maintained for at least five years.
- Since this unit is served by vapor control system, additional requirements are addressed in condition 1.
- Condition 32 requires periodic monitoring consisting of testing to assure compliance with NSR conditions.

s. Tank (S-382-182)

- Condition 9 requires that any tank gauging or sampling device on a tank vented to the vapor recovery system be equipped with a gas-tight cover. This cover shall be closed at all times except during gauging or sampling.
- Condition 10 requires that all piping, valves, and fittings be constructed and maintained in a gas tight condition. Monitoring and record keeping supporting this requirement are addressed in permit conditions 11 through 17.

t. Tank (S-382-213)

- Condition 13 requires that any tank gauging or sampling device on a tank vented to the vapor recovery system be equipped with a gas-tight cover. This cover shall be closed at all times except during gauging or sampling.
- Condition 14 requires that all piping, valves, and fittings be constructed and maintained in a gas tight condition. Monitoring and record keeping supporting this requirement are addressed in permit conditions 15 through 21.

u. Tanks (S-382-214, -217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259)

- Condition 15 requires that any tank gauging or sampling device on a tank vented to the vapor recovery system be equipped with a gas-tight cover. This cover shall be closed at all times except during gauging or sampling.
- Condition 16 requires that all piping, valves, and fittings be constructed and maintained in a gas tight condition. Monitoring and record keeping supporting this requirement are addressed in permit conditions 17 through 23.

v. Tanks (S-382-334 through -365, -368 through -380)

Condition 7 requires that all records be maintained for at least five years.

w. Tanks (S-382-381 through -384, -386 through -392)

Condition 9 requires that all records be maintained for at least five years.

x. Tank (S-382-385)

- Condition 11 requires that all records be maintained for at least five years.
- Condition 15 requires that any tank gauging or sampling device on a tank vented to the vapor recovery system be equipped with a gas-tight cover. This cover shall be closed at all times except during gauging or sampling.

- Condition 16 requires that all piping, valves, and fittings be constructed and maintained in a gas tight condition. Monitoring and record keeping supporting this requirement are addressed in permit conditions 17 through 23.
- Condition 24 requires periodic monitoring consisting of testing to assure compliance with NSR conditions.

y. Tank (S-382-403)

Condition 34 requires determination of Reid vapor pressure to ensure compliance with the NSR requirements of condition 23.

z. Tanks (S-382-404 through -407)

Condition 20 requires determination of Reid vapor pressure to ensure compliance with the NSR requirements of condition 1.

aa. Tank (S-382-408)

Condition 14 requires determination of Reid vapor pressure to ensure compliance with the NSR requirements of condition 2.

bb. Flares (S-382-409, -410, -411)

- Condition 1 of the requirements for these permit units specifies that the equipment shall not be used as a control device for federal limitations.
- Conditions 2 and 7 require the flare be checked for visible emissions and be operated according to the manufacturer's specifications, a copy of which is to be kept on site.
- Conditions 3 through 6 assure compliance with District Rule 4801 SO_x emission limit by requiring the flare be operated according to the manufacturer's specifications.
- Condition 8 requires that records of monitoring data and support information be maintained for at least five years.

cc. Tank (S-382-412)

- Condition 10 requires the operator to periodically determine the true vapor pressure of liquid stored in the tank to maintain an exemption from District Rule 4623.
- Condition 11 clarifies language used in condition 10.

- Condition 12 requires record keeping to ensure compliance.

dd. Tank (S-382-597)

Condition 28 requires the operator to periodically determine the true vapor pressure of liquid stored in the tank.

ee. Loading Rack (S-382-669)

- Conditions 15, 16, 17, 18, and 19 assure compliance with the monitoring, record keeping and reporting requirements of District Rule 4624, Section 5.4.
- Condition 20 requires that all records be maintained for at least five years.
- Condition 22 assures compliance with the monitoring, record keeping and reporting requirements of District Rule 4624, Section 5.3.

ff. Internal Combustion Engines (S-382-670, -671, -672)

- Condition 13 has been revised to require maintenance of monthly fuel use records
- Condition 19 requires district notification whenever the unit will be operated in a new location.
- Condition 20 specifies emission calculation requirements.
- Condition 21 specifies source test methods.
- Conditions 23 through 30 specify parametric monitoring requirements.

gg. Tank (S-382-673)

- Condition 11 requires a vapor collection system and specifies performance standards.
- Conditions 14, and 16 through 20 specify the methods for leak inspection of piping, fittings and other components.
- Condition 21 requires maintenance of an inspection log containing specific information to verify compliance.
- Condition 33 requires all records to be maintained for five years.
- Condition 35 requires that the vapor control system be functional at all times.
- Condition 39 requires the operator to periodically determine the true vapor pressure of liquid stored in the tank.

hh. Depurator (S-382-674)

- Condition 1 requires that the vapor recovery system is maintained as designed.
- Section 9.5.2 requires all records be maintained for at least five years and is addressed by condition 2.
- Conditions 3 and 4 require regular monitoring of the system to ensure compliance with NSR requirements.

4. District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992), Section 3.1 and District Rule 4301 Fuel Burning Equipment (Amended December 17, 1992), Sections 5.1 & 5.2.3 and Kern County Rule 407.2

a. Loading Racks (S-382-7, -669)

The requirements for District Rules 4201 and 4301 are addressed for these permit units in a streamlining analysis presented in Section C of this document.

5. District Rule 4403 Components Serving Light Crude Oil or Gases at Light Crude Oil and Gas Production Facilities and Components at Natural Gas Processing Facilities (Amended February 16, 1995)

District Rule 4403 limits fugitive VOC emissions from certain components by providing monitoring, record keeping, and reporting requirements. The rule requires operators of such units to maintain an Operator Management Plan (OMP) on file with the District. The OMP must include the following:

- 1) a description of any hazard which might affect the safety of the inspector;
- 2) identification of process units which cannot be immediately shut down for repair of leaks;
- 3) a heavy liquid stream inspection exemption list identifying process components exclusively handling heavy liquids;
- 4) specific identification of the resource commitment to a program to implement, inspect, and repair components;

5) a detailed schedule of quarterly inspections to be conducted in accordance with the test method in District Rule 4403, 6.3.4, including identification of components for which an exemption, in accordance with District Rule 4403, 4.0 is requested; and

6) repair procedures, to be used within 15 calendar days following leak detection, which results in compliance with the requirements of this rule.

Because submittal of an OMP is a startup requirement for a source subject to this rule, it is not addressed specifically as a permit condition for any units.

Section 4.1.1 provides exemption if the component(s) handle only commercial natural gas.

Section 4.1.2 provides exemption to any component exclusively handling heavy liquid streams which have less than ten (10) percent by weight evaporation at 150° C as determined by ASTM Method D-86-78 and provided the operator so identifies such components in a written heavy liquid stream inspection list.

Section 4.1.3 provides exemption to components handling liquids, after initial oil/water separation, provided the liquid has a water content of 90 percent or greater by volume.

Section 4.1.4 provides exemption to components subject to the requirements of Rule 4623 (Storage of Organic Liquids) or Rule 4401 (Steam Enhanced Crude Oil Production Well Vents).

Section 4.1.5 provides exemption to threaded connections; provided that the operator performs an inspection of each threaded connection after assembly, in accordance with the test method in Section 6.3.4 of the rule, to establish such connections do not leak under operating conditions; and provided such connections are visually inspected at least quarterly and no leakage is detected. This procedure shall also apply to threaded connections in service prior to the adoption of the rule.

Section 4.1.5 provides exemption to components handling streams with a VOC content (excluding ethane if the ethane stream being handled is less than 20 percent by volume) less than ten (10) percent by weight, as determined by the test methods in Section 6.3.1, provided such components are so identified in the operator management plan.

a. Facility wide requirements (S-382-0)

The monitoring, record keeping and reporting requirements of the rule are addressed as conditions 42 through 53 of the requirements for this facility.

b. Tank (S-382-81)

All applicable exemptions provided in Section 4.1 are addressed in conditions 23, 24 and 25.

c. Tank (S-382-123)

All applicable exemptions provided in Section 4.1 are addressed in conditions 27, 28 and 29.

6. District Rule 4623 Storage of Organic Liquids (Amended December 17, 1992) and 40 CFR 60, Subpart K Standards of Performance for Storage Vessels for Petroleum Liquids...

District Rule 4623 has been submitted to the EPA to replace the old, SIP approved, District Rule 463.2. Attachment D lists all of the applicable requirements of District Rule 4623 and shows which are included in the rule from the old, SIP approved, rule. This table shows that District Rule 4623 is as stringent as rule 463.2, thus rule 463.2 will be subsumed by rule 4623.

Section 2.0 states that this rule is only applicable to equipment used to store organic liquids, including crude oil and petroleum distillates, with a true vapor pressure of greater than 1.5 psia.

This rule requires that all tanks with a storage capacity greater than 19,800 gallons, storing organic liquids with a true vapor pressure greater than or equal to 1.5 psia, have either a floating roof or vapor recovery system to control volatile organic compound (VOC) emissions.

Section 3.7 defines the term “organic liquid” as “any liquid which contains VOCs and has a True Vapor Pressure (TVP) greater than 1.5 psia at actual storage conditions.”

Section 4.1 provides exemption if the tank is a pressure vessel maintaining working pressures sufficient at all times to prevent organic liquid loss or VOC loss to the atmosphere, then no monitoring or record keeping will be required.

Section 4.2.1 requires fixed roof tanks designated for emergency standby be equipped with a pressure relief device set to within 10 percent of the maximum allowable working pressure of the container. This section also lists other requirements regarding emergency standby status and use.

Section 4.2.3 states temporary tanks with capacities of 21,000 gallons or less may not be left on site greater than six months.

Section 5.1 of the rule provides specific physical requirements for tanks equipped with an external floating roof system. Section 5.1.1 of the rule specifies that a tank storing liquid with vapor pressure less than 11 psia may be equipped with an external, floating roof for vapor loss control.

Section 5.3.1 requires that any fixed roof tank with a storage capacity of 19,800 gallons or larger used to store any organic liquid, light crude oil or petroleum distillate with a true vapor pressure greater than 1.5 psia be equipped with a vapor loss prevention system capable of collecting all VOCs. These units also are required to contain a system for processing and for return to liquid storage or disposal of VOCs, so as to prevent their emission to the atmosphere at an efficiency of at least 95 percent by weight.

Section 5.3.2 requires that any tank gauging or sampling device on a tank vented to the vapor recovery system be equipped with a gas-tight cover. This cover shall be closed at all times except during gauging or sampling.

Section 5.3.3 requires that all piping, valves and fittings be constructed and maintained in a gas tight condition.

Section 5.4 requires that any above ground tank, used for gasoline, be equipped with a pressure relief device set to within 10 percent of the maximum allowable working pressure of the container.

Section 6 of the rule specifies periodic monitoring, record keeping and testing methods.

a. Tank (S-382-1)

- Section 5.1.1 is addressed in condition 1 of the requirements for this permit unit.
- Section 5.1 is addressed in conditions 2, 5, 6 through 11, 15 through 19, 21, and 22 of the requirements for this permit unit.
- Section 6 is addressed in conditions 23, 37, and 38 of the requirements for this permit unit.

b. Gas Lift Systems (S-382, -70)

- Section 6 is addressed in conditions 10 through 13 of the requirements for this permit unit.
- Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule do not apply.

c. Tanks (S-382-124, -265, -286, -289, -291, -292, -297, -298)

- Section 5.3 is addressed in conditions 2 and 3 of the requirements for these permit units.
- Section 6 is addressed in conditions 11 through 15 of the requirements for these permit units.

d. Tank (S-382-127)

- Section 5.3 is addressed in condition 4 of the requirements for this permit unit.
- Section 6 is addressed in conditions 18 through 21, and 23 of the requirements for this permit unit.

e. Tank (S-382-147)

- Section 3.7 exempts these units from the requirements of this rule by condition 25.
- The control requirements of 40 CFR 60, Subparts K, Ka and Kb only apply to tanks that store liquids with a TVP greater than 1.5 psia. Condition 25 exempts this tank from the requirements of 40 CFR 60, Subparts K, Ka and Kb.

f. Tank (S-382-148)

- Section 6 is addressed in conditions 1, 7, and 8 of the requirements for this permit unit.

- Other requirements are addressed in condition 5 of the requirements for this permit unit.
- Since this unit has a storage capacity of less than 19,800 gallons, the control requirements of the rule do not apply.

g. Tank (S-382-161)

Section 6 is addressed in conditions 32, 33 and 35 of the requirements for this permit unit.

h. Tank (S-382-162)

Section 6 is addressed in conditions 30, 31 and 33 of the requirements for this permit unit.

i. Tank (S-382-163)

- Section 3.7 exempts these units from the requirements of this rule by condition 27.
- The control requirements of 40 CFR 60, Subparts K, Ka and Kb only apply to tanks that store liquids with a TVP greater than 1.5 psia. Condition 27 exempts this tank from the requirements of 40 CFR 60, Subparts K, Ka and Kb.

j. Tank (S-382-182)

- Section 6 is addressed in conditions 2, 4, and 5 of the requirements for this permit unit.
- Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, this units is connected to a gas blanketing system. Conditions 9 through 17 address this situation.

k. Tank (S-382-213)

- Section 6 is addressed in conditions 7, 8, and 9 of the requirements for this permit unit.
- Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, this units is connected to a gas blanketing system. Conditions 13 through 21 address this situation.

l. Tanks (S-382-214, -217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259)

- Section 6 is addressed in conditions 9, 10 and 11 of the requirements for these permit units.
- Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, these units are connected to a gas blanketing system. Conditions 15 through 23 address this situation.

m. Tanks (S-382-334 through -337, -339 through -365)

- Section 4.2.1 is addressed in condition 2.
- Section 5.4 is addressed in condition 1.
- Section 6 is addressed in conditions 3 through 6.
- Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, these units are connected to a gas blanketing system. Conditions 13 through 21 address this situation.
- 40 CFR 60, Subpart K does not apply to these units because they have a storage capacity less than 420,000 gallons and are used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

n. Tank (S-382-338)

- Section 4.2.1 is addressed in condition 2.
- Section 5.4 is addressed in condition 1.
- Section 6 is addressed in conditions 3 through 6.
- Since this unit has a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, this unit is connected to a gas blanketing system. Conditions 12 through 20 address this situation.
- 40 CFR 60, Subpart K does not apply to this unit because it has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

o. Tank (S-382-367)

- Section 4.2.1 is addressed in condition 2.
- Section 5.4 is addressed in condition 1.

- Section 6 is addressed in conditions 3 through 6.
- Since this unit has a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, this unit is connected to a gas blanketing system. Conditions 14 through 22 address this situation.
- 40 CFR 60, Subpart K does not apply to this unit because it has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

p. Tanks (S-382-368 through -379)

- Section 4.2.1 is addressed in condition 2.
- Section 5.4 is addressed in condition 1.
- Section 6 is addressed in conditions 3 through 6.
- Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, these units are connected to a gas blanketing system. Conditions 17 through 25 address this situation.
- 40 CFR 60, Subpart K does not apply to these units because they have a storage capacity less than 420,000 gallons and are used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

q. Tank (S-382-380)

- Section 4.2.1 is addressed in condition 2.
- Section 5.4 is addressed in condition 1.
- Section 6 is addressed in conditions 3 through 6.
- Since this unit has a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, this unit is connected to a gas blanketing system. Conditions 17 through 25 address this situation.
- 40 CFR 60, Subpart K does not apply to this unit because it has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

r. Tanks (S-382-381 through -384, -386 through -392)

- Section 4.1 is addressed in condition 8.
- Section 4.2.1 is addressed in condition 2.

- Section 5.4 is addressed in condition 1.
- Section 6 is addressed in conditions 3 through 7.
- Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, this unit is connected to a gas blanketing system. Conditions 19 through 27 address this situation.
- 40 CFR 60, Subpart K does not apply to this unit because it has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

s. Tank (S-382-385)

- Section 6 is addressed in conditions 8 through 10.
- Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, this unit is connected to a vapor recovery system. Conditions 16 through 23 address this situation.
- 40 CFR 60, Subpart K does not apply to this unit because it has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

t. Tank (S-382-398)

- Section 6 is addressed in conditions 6, 7, and 8 of the requirements for this permit unit.
- Since the unit has a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, this unit is connected to a vapor recovery system. Conditions 12 and 13 through 21 address this situation.
- 40 CFR 60, Subpart K does not apply to this unit because it has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

u. Tank (S-382-401)

- Section 6 is addressed in conditions 2, 3 and 4 of the requirements for this permit unit.
- Since the unit has a storage capacity of less than 19,800 gallons, the control requirements of the rule do not apply.

- 40 CFR 60, Subpart K does not apply to this unit because it has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

v. Tanks (S-382-404 through -407)

- Section 6 is addressed in conditions 14, 15, and 16 of the requirements for these permit units.
- Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, this unit is connected to a vapor recovery system. Conditions 20 through 28 address this situation.
- 40 CFR 60, Subpart K does not apply to this unit because it has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

w. Tanks (S-382-408)

- Section 6 is addressed in conditions 8, 9 and 10 of the requirements for these permit units.
- Since the units have a storage capacity of less than 19,800 gallons, the control requirements of the rule do not apply to these units.

x. Tank (S-382-412)

- Since this unit has a storage capacity of less than 19,800 gallons, the control requirements of the rule do not apply.

y. Gas Lift System (S-382-594)

- Section 6 is addressed in conditions 5, 6 and 7 of the requirements for this permit unit.
- Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule do not apply.

z. Tank (S-382-673)

- Sections 5.3.2 and 5.3.3 are addressed in condition 13 of the requirements for this permit unit.
- Section 6 is addressed in conditions 27 through 30 of the requirements for this permit unit.

aa. Depurator (S-382-674)

- Since the unit has a storage capacity of less than 19,800 gallons, the control requirements of the rule are not mandatory; however, this unit is connected to a vapor recovery system. Conditions 1 through 4 address this situation.

7. District Rule 4624 Organic Liquid Loading (Amended December 17, 1992)

a. Loading Racks (S-382-7, -669)

The requirements for District Rule 4624 are addressed for these permit units in a streamlining analysis presented in Section C of this document.

8. District Rule 4801 Sulfur Compounds (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 407)

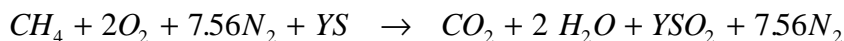
This rule replaces Kern County APCD Rule 407 and requires that sulfur compound emissions not exceed 0.2 percent by volume calculated as sulfur dioxide on a dry basis. The following table compares the stringency of these two rules and shows that the District Rule is as strict as Kern County Rule 407.

Comparison of District Rule 4801 and Kern County Rule 407

Requirement	SJVUAPCD	KCAPCD
A person shall not discharge sulfur compounds into the atmosphere which would exceed 0.2 percent by volume calculated as sulfur dioxide.	X	X
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	X	

The following calculations determine the maximum fuel sulfur content that will result in compliance with District Rule 4801.

Assuming that 0% excess air in the exhaust stream corresponds with maximum SO_x emissions concentration (neglecting NO_x and SO_x relative to SO₂ in the exhaust) and that CH₄ represents a typical gaseous fuel, the combustion equation is:



where: Y = moles of sulfur in the fuel.

Solving an expression for the fraction of SO₂ in the dry exhaust by volume gives:

$$\frac{Y}{1 + 7.56} = 0.002 \Rightarrow Y = 0.01712$$

where: Y = mole fraction of S per mole of CH₄ combusted
1 = one mole of CO₂
7.56 = number of moles of N₂
0.002 = 0.2% by volume = 2000 ppmv (District Rule 4801)

Use Y to calculate the weight fraction of S in one mole of CH₄:

$$\frac{(0.01712)(32.06)}{(16.04) + (0.01712)(32.06)} = 0.033 \Rightarrow 3.3\% \text{ S by weight}$$

where: 32.06 = molecular weight of sulfur (S)
16.04 = molecular weight of methane (CH₄)
0.033 = fraction of S by weight in the fuel

The preceding calculation shows that an exhaust concentration of 0.2% by volume corresponds to a gaseous fuel sulfur content by weight of 3.3%.

The limit determined above for gaseous fuels is 3.3 weight percent sulfur. This value is conservative for field gas, which frequently has a lower heating value and higher exhaust volume flow rate than pure methane.

a. Safety Flares (S-382-409, -410, -411)

Operators will comply with the above fuel sulfur limit by fuel testing using grab sample analysis by GC-FPD/TCD performed in the laboratory. Fuel sulfur content testing shall be performed weekly except that if compliance has been demonstrated for eight consecutive weeks, then the testing frequency shall be semi-annual. Compliance is assured by conditions 3 through 6 of the requirements for these permit units.

9. 40 CFR Part 60 Subpart A General Provisions

Section 60.18 (c)(1) requires flares to be designed and to operate with no visible emissions, except for periods not to exceed 5 minutes during any 2 consecutive hours. Section 60.18 (f)(1) also requires that visible emissions

determinations be made using EPA Method 22. Compliance with these requirements is assured by permit conditions.

Sections 60.18 (c)(2), 60.18 (e), and 60.18 (f)(2) require that flares be operated with a flame present at all times when emissions may be vented to them. The presence of the pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the flame presence. Compliance with these requirements will be assured by a permit condition.

a. Loading Rack (S-382-7)

This unit is not subject to the requirements of 40 CFR 60, therefore section 60.18 (c)(1) is not applicable.

b. Loading Rack (S-382-669)

This unit is not subject to the requirements of 40 CFR 60, therefore section 60.18 (c)(1) is not applicable.

10.40 CFR Part 60, Subpart Ka Standards of Performance for Storage Vessels for Petroleum Liquids...

a. Tank (S-382-1)

Conditions 2, 3, 4, 5, 10 through 15, 20 through 23, 27 through 36, 40 and 41 of the requirements for this permit unit specifies the necessary operational and monitoring provisions from the federal rule.

b. Gas Lift Systems (S-382-68, -70, -594)

Since the unit has a storage capacity of less than 19,800 gallons, the control requirements of the rule do not apply to these units.

c. Tanks (S-382-124, -265, -286, -289, -291, -292, -297, -298, -382)

Section 112a is addressed in condition 1 of the requirements for these permit units.

d. Tank (S-382-147)

Conditions 25 and 26 of the requirements for this permit unit requires that the facility determine and maintain records of the TVP of petroleum

liquids stored in this tank, thereby maintaining exemption of this tank from the requirements of 40 CFR 60, Subpart Ka.

e. Tank (S-382-163)

Conditions 27 and 32 of the requirements for this permit unit requires that the facility determine and maintain records of the TVP of petroleum liquids stored in this tank, thereby maintaining exemption of this tank from the requirements of 40 CFR 60, Subpart Ka.

f. Tanks (S-382-182, -213, -214, -217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259, -412)

Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule do not apply.

g. Tanks (S-382-334 through -365, -367 through -392, -398, -401, -404 through -408)

40 CFR 60, Subpart Ka does not apply to these units because they have a storage capacity less than 420,000 gallons and are used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

11.40 CFR Part 60, Subpart Kb Standards of Performance for Storage Vessels for Petroleum Liquids...

Section 112b of the federal rule requires that units be equipped with either a floating roof, a closed vent system and control device, or its equivalent.

Section 60.113b describes start up conditions consisting of an operating plan demonstrating that the control device used will prevent the emission of VOC to the atmosphere with an efficiency of at least 95%.

a. Gas Lift Systems (S-382-68, -70, -594)

Since the unit has a storage capacity of less than 19,800 gallons, the control requirements of the rule do not apply to these units.

b. Tank (S-382-127)

- Conditions 2, 3, 4, 6, 7, 10, 13 through 17, 22, 24, and 26 specify the necessary operational and monitoring provisions from the federal rule.

- Section 60.113b and associated record keeping are addressed by condition 1 of the requirements for this permit unit.

c. Tank (S-382-147)

Conditions 25 and 26 of the requirements for these permit units requires that the facility determine and maintain records of the TVP of petroleum liquids stored in these tanks, thereby maintaining exemption of these tanks from the requirements of 40 CFR 60, Subpart Kb.

d. Tank (S-382-161)

- Conditions 17, 18, 20, 27 through 31, 34, 36, and 37 of the requirements for this permit unit, specify the necessary operational and monitoring provisions from the federal rule.
- Section 60.113b and associated record keeping are addressed by condition 16 of the requirements for this permit unit.

e. Tank (S-382-162)

- Conditions 15, 16, 18, 25 through 29, 32, 34, and 35 of the requirements for this permit unit, specify the necessary operational and monitoring provisions from the federal rule.
- Section 60.113b and associated record keeping are addressed by condition 14 of the requirements for this permit unit.

f. Tank (S-382-163)

Conditions 27 and 32 of the requirements for these permit units requires that the facility determine and maintain records of the TVP of petroleum liquids stored in these tanks, thereby maintaining exemption of these tanks from the requirements of 40 CFR 60, Subpart Kb.

g. Tanks (S-382-182, -213, -214, -217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259, -412)

Since these units have a storage capacity of less than 19,800 gallons, the control requirements of the rule do not apply.

h. Tanks (S-382-334 through -365, -367 through -392, -398, -401, -404 through -408)

40 CFR 60, Subpart Kb does not apply to these units because they have a storage capacity less than 420,000 gallons and are used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer.

i. Tank (S-382-673)

- Section 60.113b and associated record keeping are addressed by condition 10 of the requirements for this permit unit.
- Conditions 11, 12, 13, 15, 22 through 26, 31, 32, 34 specify the necessary operational and monitoring provisions from the federal rule.

12.40 CFR Part 52 - PSD Permit Conditions

USEPA PSD permit SJ 77-42 was issued/modified by Region IX on February 25, 1982. Conditions from this permit were addressed to define how permit terms should be incorporated into Title V permits S-382-32, -62, and -63.

- Permit Expiration
This condition has been satisfied and is therefore obsolete. This condition has not been included in the requirements for these permit units.
- Notice Of Startup
This condition has been satisfied and is therefore obsolete. This condition has not been included in the requirements for these permit units.
- Facilities Operation
This condition has been included as condition 17 of the requirements for unit -32.
This condition has been included as condition 18 of the requirements for units -62 and -63.
- Malfunction
This condition has been included as conditions 18 and 19 of the requirements for unit -32.
This condition has been included as conditions 19 and 20 of the requirements for units -62 and -63.
- Right to Entry
This condition has been subsumed by permit template conditions 18 through 21 of the facility wide permit.
- Transfer of Ownership or Control

This condition appears to be a pre-construction requirement, and has been satisfied, and is therefore obsolete. This condition has not been included in the requirements for these permit units.

- Severability

This condition has been subsumed by permit template condition 12 of the facility wide permit.

- Special Conditions

Start-up conditions have been satisfied and are therefore obsolete. Start-up conditions have not been included in the requirements for these permit units.

Other special conditions have been included as conditions 20 through 24 of the requirements for unit -32.

Other special conditions have been included as conditions 21 through 26 of the requirements for units -62 and -63.

- Agency Notifications

This condition has been included as condition 25 of the requirements for unit -32.

This condition has been included as condition 27 of the requirements for units -62 and -63.

13. 40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

The requirements of this provision are addressed in conditions 65, 66 and 67 of the facility-wide requirements (S-382-0).

14. 40 CFR Part 68 - Chemical Accident Prevention Provisions

The requirements of this provision mandate that subject facilities submit a Risk Management Plan to the proper authority. Condition 41 of the facility wide requirements (S-382-0) requires compliance with this provision.

C. Streamlining of Multiple Applicable Requirements

1. District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992), Section 3.1 and District Rule 4301 Fuel Burning Equipment (Amended December 17, 1992), Sections 5.1 & 5.2.3 and Kern County Rule 407.2

These rules contain limits on emissions of particulate matter (PM). The following analysis shows that the proposed permit PM requirements are as stringent as District Rules 4301 and 4201 and more stringent than Kern

County Rule 407.2. Streamlining procedures, as documented in the following steps, are used to substitute the proposed set of requirements for the otherwise applicable requirements.

Side-by-side Comparison of Applicable Requirements:

CITATION:	District Rule 4201	District Rule 4301	Kern County Rule 407.2	Proposed Requirements
WORK PRACTICE STANDARDS:	•None	•None	•None	•None
EMISSION LIMIT:	•0.1 grain/cf, at dry standard conditions [4201, 3.1]	•0.1 grain/cf, calculated to 12% CO ₂ at dry standard conditions [4301, 5.1] •10 lb/hr [4301, 5.2.3]	•0.1 grain/cf, calculated to 12% CO ₂ at standard conditions [407.2]	•0.1 grain/dscf [4201, 3.1] •0.1 grain/cf, calculated to 12% CO ₂ at dry standard conditions [4301, 5.1] •10 lb/hr [4301, 5.2.3]
MONITORING:	•None	•None	•None	•source testing when firing on residual oil (including crude) within 60 days of said firing [2520, 9.4.2]
RECORDKEEPING:	•None	•None	•None	•record daily amount of all fuels combusted, the dates on which firing on any fuel other than certified gaseous or diesel fuel has occurred, as well as the type of non-certified fuel fired [2520, 9.4.2]
REPORTING:	•None	•None	•None	•None
TEST METHODS:	•Particulate matter concentration - EPA Method 5 [4201, 4.1] •Stack gas velocity – EPA Method 2 [4201, 4.2] •Stack gas moisture – EPA Method 4 [4201, 4.3]	•Particulate matter concentration - EPA Method 5 [4301, 5.1] •Stack gas velocity - EPA Method 2 [4301, 5.5] •Stack gas moisture - EPA Method 4 [4301, 5.6]	•None	•Particulate matter concentration - EPA Method 5 (note EPA Methods 2 and 4 are referenced within Method 5) [4301, 5.1 and 4201, 4.1]

Select most stringent emission limit or performance standard:

The proposed PM emission limits of:

0.1 grain/dscf of gas calculated to 12% carbon dioxide, and

0.1 grain/dscf of gas, and

10 lb/hr

are at least as stringent as those imposed by District Rules 4201 and 4301 and more stringent than Kern County Rules 407.2, as demonstrated below:

Compliance with PM Limit - District Rule 4301, 5.1:

This rule requires PM emissions to be limited to the following:

0.1 grain per cubic foot of gas calculated to 12% carbon dioxide at dry standard conditions and 10 lb/hr.

Compliance with PM Limit - District Rule 4201:

This rule requires PM emissions to be limited to the following:

0.1 grain per cubic foot of gas at dry standard conditions

The excess air in the exhaust of these units ranges from 0 to 4%, when calculated at 12% carbon dioxide (see Attachment E). Since maximum particulate emissions occur at 0% excess air, which may occur at operating CO₂ levels and dry standard conditions, the above limit is also included in the conditions of the permit(s). The proposed limits are at least as stringent as the requirements of this rule.

Compliance with PM Limit - Kern County Rule 407.2

These rules require PM emissions to be limited to the following:

0.1 grain per cubic foot of gas calculated to 12% carbon dioxide at standard conditions

These old county rules do not specify dry conditions, so wet conditions are appropriately assumed. The proposed requirement of 0.1 grains/dscf,

calculated to 12% carbon dioxide is more stringent than the requirements from the county rules referenced above, since the total wet exhaust volume from any unit is greater than the dry exhaust volume, while the total mass of particulate matter is constant. This is verified by comparing the F factors in 40 CFR 60, Appendix A, Table 19.1. F_w (wet) is always greater than F_d (dry) for any fuel, and when F_w is substituted for F_d in the compliance calculations below in Step 3, it will always yield a lower PM emissions value than F_d . Therefore the proposed conditions are more stringent than the county rules.

Conditions ensuring compliance with applicable requirements

An excess air concentration of 0% in the exhaust results in the maximum particulate matter concentration for any given emission rate. Therefore, the following calculations use an uncorrected F factor to represent worst-case emissions. Calculations determining the excess air concentrations for 12% CO₂ are shown in Attachment E.

GASEOUS FUEL FIRED UNITS

The following calculations, using AP-42 emission factors for natural gas, demonstrate that the emission of PM during the firing of gaseous fuels complies with the limits of these rules.

$$\left(\frac{13.7 \text{ lb PM}}{10^6 \text{ cf}} \right) \left(\frac{1 \text{ scf}}{900 \text{ Btu}} \right) \left(\frac{100 \text{ MMBtu}}{\text{hr}} \right) = \left(\frac{1.52 \text{ lb PM}}{\text{hr}} \right) < \left(\frac{10 \text{ lb PM}}{\text{hr}} \right)$$

$$\left(\frac{13.7 \text{ lb PM}}{10^6 \text{ ft}^3} \right) \left(\frac{1 \text{ scf}}{900 \text{ Btu}} \right) \left(\frac{1 \text{ MMBtu}}{8710 \text{ dscf}} \right) \left(\frac{7000 \text{ grain}}{1 \text{ lb}} \right) = \left(\frac{0.01 \text{ grain}}{\text{dscf}} \right) < \left(\frac{0.1 \text{ grain}}{\text{dscf}} \right)$$

where:

$13.7 \frac{\text{lb PM}}{10^6 \text{ cf}}$ = sum of filterable and condensable uncontrolled emission factors for natural gas-fired boilers (AP42, Table 1.4-2)

$\frac{900 \text{ Btu}}{1 \text{ scf}}$ = the minimum expected higher heating value of natural gas (AP42, Table 1.4.1)

$\frac{100 \text{ MMBtu}}{\text{hr}}$ = maximum heat input this template

$$\frac{8710 \text{ dscf}}{1 \text{ MMBtu}} = \text{F factor, } F_d, \text{ for natural gas at 0\% O}_2 \text{ (40CFR60, App. A, Table 19-1)}$$

$$\frac{10,610 \text{ wscf}}{1 \text{ MMBtu}} = \text{F factor, } F_w, \text{ for natural gas at 0\% O}_2 \text{ (40CFR60, App. A, Table 19-1)}$$

$$\frac{7000 \text{ grain}}{1 \text{ lb}} = \text{conversion factor (AP-42, Appendix A)}$$

The only constituents found in non-regulated gas streams that contribute to the formation of PM are sulfur and, occasionally, trace amounts of metals. Any metals present in the gas stream are removed during the free water knock-out stage in the condenser at the compressor. The results of source tests on units operating on combined waste gas and natural gas show PM levels far below allowable levels (actual source tests are on file with the District). Based on these source test results and the preceding compliance analysis, compliance with applicable PM limits is assured without the need for PM testing.

DIESEL FUEL OIL UNITS

For diesel fired units, the 12% CO₂ correction required by District Rule 4301 in the exhaust stream occurs at 4% O₂. A more conservative analysis is obtained by calculating emissions at 0% O₂ and thus, the following compliance analysis uses F-factors uncorrected from 0% O₂.

$$\left(\frac{2 \text{ lb PM}}{10^3 \text{ gal}} \right) \left(\frac{1 \text{ gal}}{137,000 \text{ Btu}} \right) \left(\frac{100 \text{ MMBtu}}{\text{hr}} \right) = 15 \frac{\text{lb PM}}{\text{hr}} < 10 \frac{\text{lb PM}}{\text{hr}}$$

$$\left(\frac{2 \text{ lb PM}}{10^3 \text{ gal}} \right) \left(\frac{1 \text{ gal}}{137,000 \text{ Btu}} \right) \left(\frac{1 \text{ MMBtu}}{9190 \text{ dscf}} \right) \left(\frac{7000 \text{ gr}}{1 \text{ lb}} \right) = \left(\frac{0.01 \text{ grain}}{\text{dscf}} \right) < \left(\frac{0.1 \text{ grain}}{\text{dscf}} \right)$$

where:

$$\frac{2 \text{ lb PM}}{10^3 \text{ gal}} = \text{the emission factor for filterable PM, No. 2 fuel oil, (AP-42, Table 1.3-2)}$$

$$\frac{137,000 \text{ Btu}}{1 \text{ gal diesel}} = \text{heating value (AP-42, Appendix A)}$$

$$\frac{9190 \text{ dscf}}{\text{MMBtu}} = \text{F factor, } F_d, \text{ for oil (40CFR60, App. A, Method 19, Table 19-1)}$$

$$\frac{10,320 \text{ wscf}}{\text{MMBtu}} = \text{F factor, } F_w, \text{ for oil (40CFR60, App. A, Method 19, Table 19-1)}$$

The preceding calculations demonstrate that the emissions of PM are expected to be well below applicable limits. Compliance with these limits is expected for even the largest units at this facility and, therefore, no testing, record keeping, reporting, or monitoring will be required for these units.

RESIDUAL OIL FIRED (INCLUDING CRUDE OR TOPPED CRUDE)

Compliance with PM limits will be assured by permit conditions that require source testing when firing on residual oil (including crude or topped-crude). The operator is required to record daily amount of all fuels combusted and the dates on which firing on any fuel other than certified gaseous or diesel fuel has occurred by permit condition(s), as well as the type of non-certified fuel fired.

Certify compliance

By signing the Compliance Certification Form (TVFORM-005), the applicant has certified compliance with the proposed set of streamlined conditions.

Compliance schedule for new monitoring requirements

Not applicable.

Request for permit shield

District Rule 4201 has been submitted to the EPA to replace SIP approved Kern County Rules 404 and 404.1. District Rule 4301 has been submitted to the EPA to replace SIP approved Kern County Rule 408. The EPA issued stringency findings dated August 20, 1996 stating that District Rules 4201 and 4301 are more strict than the county SIP approved rules referenced above. A permit shield from these county SIP rules, District Rule 4201, 4301, and Kern County Rule 407.2 shall be granted.

a. Loading Rack (S-382-669)

- Permit Shields are granted in condition 23.

2. District Rule 4624 Organic Liquid Loading (Amended December 17, 1992) and Kern County Rule 413

These rules establish volatile organic compound (VOC) emission limits and work practice standards for loading facilities. District Rule 4624, formerly District Rule 463.3, has been submitted to the EPA to replace SIP approved Kern County Rule 413.

The permit units are located at a Class 1 Organic Liquid Loading Facility, as defined in District Rule 4624, and subject to District Rule 4624. Pursuant to District Rule 4624, a Class 1 Organic Liquid Loading Facility is any facility capable of loading 20,000 gallons or more on any one day of organic liquids with a TVP of 1.5 psia or greater into tank trucks, trailers, or railroad tank cars.

The following analysis shows that the VOC emission requirements of District Rule 4624 are more stringent than the emission requirements of Kern County Rule 413. Streamlining procedures, in accordance with White Paper Number 2 and as documented in the following steps, are utilized to substitute the proposed set of requirements for the otherwise applicable requirements.

Side-by-side Comparison of Applicable Requirements:

CITATION:	District Rule 4624	Kern County Rule 413	Proposed Requirements
WORK PRACTICE STANDARDS SUPPORTING EMISSION LIMIT (E.L.)	<ul style="list-style-type: none"> •Delivery tanks which previously contained organic liquids with a TVP greater than 1.5 psia at loading conditions shall be filled only at loading facilities satisfying Sections 5.1 and 5.2. [4624, 5.3] •Facility shall be equipped with bottom loading and a vapor-collection-and-control system. [4624, 5.1.1] •Operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [4624, 5.2] 	<ul style="list-style-type: none"> • Loading facility equipped with vapor collection and disposal system. 	<ul style="list-style-type: none"> •Delivery tanks which previously contained organic liquids, with a TVP greater than 1.5 psia at loading conditions shall be filled only at loading facilities satisfying Sections 5.1 and 5.2. [4624, 5.3] •Facility shall be equipped with bottom loading and a vapor collection and control system. [4624, 5.1.1] •Operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [4624, 5.2] •Loading of a delivery vessel shall discontinue if its pressure relief valve opens and corrective action shall be taken. [2520, 9.4.2]

EMISSION LIMIT	<ul style="list-style-type: none"> •VOC emissions shall not exceed 0.08 pound per 1000 gallons of organic liquid loaded. [4624, 5.1.1] 	<ul style="list-style-type: none"> •Disposal system of displaced vapors during loading shall consist of one of the following: 1) system with 90% efficiency or 2) directs vapors to fuel gas system, or 3) with efficiency as great as 1 or 2. 	<ul style="list-style-type: none"> •VOC emissions shall not exceed 0.08 pound per 1000 gallons of organic liquid loaded. [4624, 5.1.1]
WORK PRACTICE STANDARD NOT SUPPORTING E.L.	<ul style="list-style-type: none"> •Loading and vapor collection equipment maintained such that there are no liquid leaks in excess of 3 drops/min or vapor leaks in excess of 10,000 ppm. [4624, 5.4] •Loading device maintained to prevent liquid drainage in excess of 10 ml per average of 3 consecutive disconnects. [4624, 5.4] •Construction, reconstruction, or expansion of any top loading facility shall not be allowed. [4624, 5.5] 	<ul style="list-style-type: none"> •Measures shall be taken to prevent liquid drainage from loading device. 	<ul style="list-style-type: none"> •Loading and vapor collection equipment shall be designed and operated such that there are no leaks. (leaks as defined in rule). [4624, 5.4] •Loading device shall have no excess organic liquid drainage at disconnects (excess drainage as defined in rule). [4624, 5.4] • Each leak shall be repaired within 15 days of detection. [2520, 9.4.2] •Construction, reconstruction, or expansion of any top loading facility shall not be allowed. [4624, 5.5]
MONITORING	<ul style="list-style-type: none"> •None 	<ul style="list-style-type: none"> •None 	<ul style="list-style-type: none"> • Maintain all records necessary to demonstrate compliance with VOC emission limit which include component counts for fugitive emission sources and recognized emission factors for fugitive emission sources. [2520, 9.4.2] •Perform annual vapor collection and control system pressure tests. [2520, 9.4.2] •Perform monthly leak inspection and drainage inspection. Change to quarterly drainage inspections under certain conditions [2520, 9.4.2]
RECORD KEEPING	<ul style="list-style-type: none"> •Maintain all records for a period of not less than two years. [4624, 6.1] 	<ul style="list-style-type: none"> •None 	<ul style="list-style-type: none"> •Maintain all records for a period of not less than five years. [2520, 9.5.2]
REPORTING	<ul style="list-style-type: none"> •None 	<ul style="list-style-type: none"> •None 	<ul style="list-style-type: none"> •None

TEST METHOD	<ul style="list-style-type: none"> • Leak detection with portable hydrocarbon detection instrument calibrated with methane (i.e. similar to EPA Method 21) [4624, 3.6] • Halogenated exempt compounds by ARB Method 432. [4624, 6.2.1] • VOC emissions by using 40CFR§60.503 and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 432, or ARB Method 2-4. (Note this is for a control device exhausting to atmosphere.) [4624, 6.2.2] 	•None	<ul style="list-style-type: none"> • Halogenated exempt compounds by ARB Method 432. [4624, 6.2.1] • Leak detection by portable hydrocarbon detection instrument calibrated with methane. [2520. 9.4.2]
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Select most stringent emission limit and/or performance standard:

VOC Emission Limits

Emission Limit Expressed as Control Efficiency: Kern County rule 413 requires a control device capable of 90% efficiency. The proposed emission limit requirement of 0.08 lb VOC/1000 gallons loaded is more stringent than the 90% control efficiency requirement, as demonstrated below:

90% Efficiency for Vapors Displaced:

$$L_L = 12.46 \left(\frac{SPM}{T} \right) \left(1 - \frac{eff}{100} \right)$$

where:

L_L = Loading losses from tank truck, pounds per 1000 gallons loaded (AP-42, 5.2, equation (1))

S = 0.5, worst case saturation factor from AP-42 table 5.2-1

P = 2.3, true vapor pressure of gasoline, worst case from AP-42, Table 7.1-2 and using Reid vapor pressure of 7 psia (from AP-42, 5.2), as worst case for gasoline at 40°F

M = 68, molecular weight of gasoline vapors, from AP-42 table 7.1-2

T = 40°F = 500°R, worst case temperature of fluid during loading conditions

eff = 90%, overall reduction efficiency

Minimizing the numerator in SPM/T and maximizing the denominator will result in the worst case values (i.e. lowest emissions) for variables in the above equation. This will occur with the lowest saturation factor for loading clean cargo tank and lowest loading temperature expected,

which results in the lowest true vapor pressure expected. Loading losses for gasoline collection and control systems with 90% efficiency are calculated to be 1.9 lb VOC/1000 gallons loaded. This value is much greater than that allowed by the proposed emission limit of 0.08 lb VOC/1000 gallons loaded. Therefore, the proposed limit is more stringent and assures compliance.

Work Practice Standards Not Supporting An Emissions Limit

The proposed work practice standards not in support of an emission limit consist of the following:

- Loading and vapor collection shall be designed and operated such that there are no leaks and no excess organic liquid drainage at disconnections (leaks and excess drainage as defined in Rule 4624).
- Each leak shall be repaired within 15 days of detection.
- Construction, reconstruction, or expansion of any top loading facility shall not be allowed.

These proposed work practice standards are more stringent than those of Kern County rule 413, as demonstrated below.

District Rule 4624: This rule has 3 work practice standards not in support of an emissions limit. Two of the work practice standards address leaks and liquid drainage. The third standard prohibits the source from constructing, reconstructing, or expanding any top loading facility. The proposed work practice standards are identical to the requirements of District Rule 4624.

Kern County Rule 413: This rule contains one work practice standard not in support of an emissions limit which addresses liquid drainage. The proposed standards requiring no leaks in the loading and vapor collection system (vapor detected in excess of 10,000 ppm and liquid in excess of 3 drops/minute) and no leaks in excess of 10 mls at disconnection are as stringent or more stringent than that required by the county rule.

Conditions ensuring compliance with applicable requirements:

Refer to specific permit unit below

Certify compliance

By signing the Compliance Certification Form (TVFORM-005), the applicant has certified compliance with the proposed set of streamlined conditions.

Compliance schedule for new monitoring requirements

Not applicable.

Request for permit shield

A permit shield will be granted from the requirements of Kern County Rule 413.

a. Loading Rack (S-382-7)

- Condition 4 requires VOC emissions from loading racks to be in compliance with 0.08 pound per 1000 gallons of organic liquid loaded.
- Conditions 5, 6, 14 and 15 have been included to meet work practice standards in support of the emission limit.
- Conditions 7 and 8 have been included to meet work practice standards not in support of an emission limit.
- Permit Shields are granted in condition 18.

b. Loading Rack (S-382-669)

- Condition 10 requires VOC emissions from loading racks to be in compliance with 0.08 pound per 1000 gallons of organic liquid loaded.
- Conditions 11, 12, 21 and 25 have been included to meet work practice standards in support of the emission limit.
- Conditions 13, 14 have been included to meet work practice standards not in support of an emission limit.
- Permit Shields are granted in conditions 23 and 24 of the requirements for this permit unit.

X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Operating Permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

By using the model general permit templates listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the templates. The basis for each permit shield is discussed in the Permit Shield section of each template.

B. Requirements not Addressed by Model General Permit Templates

The applicant is requesting a permit shield for each of the following requirements:

1. District Rule 4623

Compliance with the requirements of this rule was addressed in Section IX of this document. Therefore, a permit shield is being granted in: condition 42 of the requirements for unit -1; conditions 14 and 16 of the requirements for units -68 and -70; condition 18 of the requirements for units -124, -265, -286, -289, -291, -292, -297, -298; condition 28 of the requirements for unit -127; condition 17 of the requirements for units -147 and -404 through -407; conditions 9 and 11 of the requirements for unit -148; condition 39 of the requirements for unit -161; condition 37 of the requirements for unit -162; condition 18 of the requirements for unit -163; condition 6 of the requirements for unit -182; condition 10 of the requirements for unit -213; condition 8 of the requirements for units -334 through -365, -367 through -384, -386 through -392; condition 12 of the requirements for units -214, -217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259, -385; condition 9 of the requirements for permit unit -398; conditions 5 and 7 of the requirements for permit unit -401; conditions 11 and 13 of the requirements for permit unit -408; condition 8 of the requirements for permit unit -412; conditions 8 and 10 of the requirements for permit unit -594; and condition 36 of the requirements for unit -673.

2. District Rule 4624

Compliance with the requirements of these rules was addressed in Section IX of this document. Therefore, a permit shield is being granted for these requirements in condition 18 of the requirements for unit -7 and condition 24 of the requirements for unit -669.

3. District Rule 4661

The provisions of this rule are limited to organic solvents. Organic solvents are defined in this rule as organic materials which are liquids at standard conditions and which are used as dissolvers, viscosity reducers or cleaning agents. This rule does not apply to units listed below. A permit shield is granted from this requirement in: condition 44 of the requirements for unit -1; condition 16 of the requirements for units -68 and -70; condition 20 of the requirements for units -124, -265, -286, -289, -291, -292, -297, -298; condition 30 of the requirements for unit -127; condition 19 of the requirements for unit -147 and -404 through -407; condition 11 of the requirements for units -148 and -398; condition 41 of the requirements for unit -161; condition 39 of the requirements for unit -162; condition 20 of the requirements for unit -163; condition 8 of the requirements for unit -182; condition 12 of the requirements for unit -213; condition 10 of the requirements for units -334 through -365, -367 through -384, -386 through -392; condition 14 of the requirements for units -214, -217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259, -385; condition 7 of the requirements for unit -401; condition 13 of the requirements for unit -408; condition 10 of the requirements for unit -594; and condition 38 of the requirements for unit -673.

4. District Rule 4801

This rule specifies testing requirements for a stack source. Tank emissions are fugitive emissions not considered to come from a point source. Therefore, this rule does not apply to units listed below. A permit shield is granted from this requirement in: condition 44 of the requirements for unit -1; condition 16 of the requirements for units -68 and -70; condition 20 of the requirements for unit -124; condition 30 of the requirements for unit -127; condition 19 of the requirements for unit -147 and -404 through -407; condition 11 of the requirements for units -148 and -398; condition 41 of the requirements for unit -161; condition 39 of the requirements for unit -162; condition 20 of the requirements for unit -163; condition 8 of the requirements for unit -182; condition 12 of the requirements for unit -213; condition 10 of the requirements for units -334 through -365, -367 through -384, -386 through -392; condition 14 of the requirements for units -214, -

217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259, -385; condition 18 of the requirements for unit -265; condition 20 of the requirements for units -286, -289, -291, -292, -297, -298; condition 7 of the requirements for unit -401; condition 13 of the requirements for unit -408; condition 10 of the requirements for unit -594; and condition 38 of the requirements for unit -673.

5. 40 CFR 60, Subpart K

A permit shield will be granted for 40CFR60 Subpart K because units listed below did not commence construction, modification, or reconstruction before May 18, 1978. This rule only applies to units that commence construction, modification, or reconstruction before this date. A permit shield is granted from this requirement in: condition 43 of the requirements for unit -1; condition 19 of the requirements for unit -124; condition 29 of the requirements for unit -127; condition 40 of the requirements for unit -161; condition 38 of the requirements for unit -162; condition 19 of the requirements for units -265, -286, -289, -291, -292, -297, -298; and condition 37 of the requirements for unit -673.

Compliance with the requirements of this rule was addressed in Section IX of this document. Therefore, a permit shield is being granted for these requirements in: condition 15 of the requirements for units -68 and -70; condition 18 of the requirements for unit -147 and -404 through -407; condition 10 of the requirements for units -148 and -398; condition 19 of the requirements for unit -163; condition 7 of the requirements for unit -182; condition 11 of the requirements for unit -213; condition 9 of the requirements for units -334 through -365, -367 through -384, -386 through -392; condition 13 of the requirements for units -214, -217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259, -385; condition 6 of the requirements for unit -401; condition 12 of the requirements for unit -408; condition 8 of the requirements for permit unit -412; and condition 9 of the requirements for unit -594.

6. 40 CFR 60, Subpart Ka

Compliance with the requirements of this rule was addressed in Section IX of this document. Therefore, a permit shield is being granted for these requirements in: condition 42 of the requirements for unit -1; condition 15 of the requirements for units -68 and -70; condition 18 of the requirements for units -124, -147, -265, -286, -289, -291, -292, -297, -298 and -404 through -407; condition 10 of the requirements for units -148 and -398;

condition 19 of the requirements for unit -163; condition 7 of the requirements for unit -182; condition 11 of the requirements for unit -213; condition 9 of the requirements for units -334 through -365, -367 through -384, -386 through -392; condition 13 of the requirements for units -214, -217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259, -385; condition 6 of the requirements for unit -401; condition 12 of the requirements for unit -408; condition 8 of the requirements for permit unit -412; and condition 9 of the requirements for unit -594.

A permit shield will be granted for 40CFR60 Subpart Ka because units listed below did not commence construction, modification, or reconstruction after May 18, 1978 or before July 23, 1984. This rule only applies to units that commence construction, modification, or reconstruction during this period. A permit shield is granted from this requirement in: condition 29 of the requirements for unit -127; condition 40 of the requirements for unit -161; condition 38 of the requirements for unit -162; and condition 37 of the requirements for unit -673.

7. 40 CFR 60, Subpart Kb

Compliance with the requirements of this rule was addressed in Section IX of this document. Therefore, a permit shield is being granted for these requirements in: condition 15 of the requirements for units -68 and -70; condition 28 of the requirements for unit -127; condition 18 of the requirements for unit -147 and -404 through -407; condition 10 of the requirements for units -148 and -398; condition 39 of the requirements for unit -161; condition 37 of the requirements for unit -162; condition 19 of the requirements for unit -163; condition 7 of the requirements for unit -182; condition 11 of the requirements for unit -213; condition 9 of the requirements for units -334 through -365, -367 through -384, -386 through -392; condition 13 of the requirements for units -214, -217, -225, -229, -233, -235, -236, -238, -245, -248, -255, -258, -259, -385; condition 6 of the requirements for unit -401; condition 12 of the requirements for unit -408; condition 8 of the requirements for permit unit -412; condition 9 of the requirements for unit -594; and condition 36 of the requirements for unit -673.

A permit shield will be granted for 40CFR60 Subpart Kb because units listed below did not commence construction, modification, or reconstruction after July 23, 1984. This rule only applies to units that commence

construction, modification, or reconstruction after this date. A permit shield is granted from this requirement in: condition 43 of the requirements for unit -1; condition 19 of the requirements for unit -124; condition 19 of the requirements for units -265, -286, -289, -291, -292, -297, -298.

8. Kern County Rules 108.1, 404, 404.1, 407.2, 408 and 413 and District Rules 4201 and 4301

Compliance with the requirements of these rules was addressed in Section IX of this document. Therefore, a permit shield is being granted for these requirements in condition 18 or the requirements for unit -7, condition 11 of the requirements for units -409, -410 and -411 and condition 23 of the requirements for unit -669.

XI. PERMIT CONDITIONS

See attached Operating Permit.

Occidental — Western Light Oil
Facility #: S-382
Project #: 970330

G:\PER\TITLEV\EVAL\Light oil\S0382 (Occidental Western Light Oil)\FINAL #970330

ATTACHMENT A

Permitted Equipment

ATTACHMENT B

Exempt Equipment

The following exempt equipment was identified by the applicant on TVFORM-003,
Insignificant Activities

Exemption Category	Rule 2020 Citation	✓
Structure or incinerator associated with a structure designed as a dwelling for 4 families or less.	4.2.3	✓
Use of less than 2 gal/day of graphic arts materials.	5.4	✓
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	5.1.1	✓
Piston-type internal combustion engine with maximum continuous rating of 50 braking horsepower (bhp) or less.	5.1.2	✓
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less.	5.1.3	✓
Space heating equipment other than boilers.	5.1.4	✓
Locomotives, airplanes, and watercraft used to transport passengers or freight.	5.2	✓
Cooling towers with a circulation rate less than 10,000 gal/min.	5.3	✓
Equipment at retail establishments used to prepare food for human consumption.	5.5.1	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by Section 5.1.1.	5.5.2	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plasticizer or blowing agent is used.	5.6	✓
Containers used to store clean produced water.	5.7.1	✓
Containers ≤ 100 bbl used to store oil with specific gravity ≥ 0.8762 .	5.7.2	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762 .	5.7.3	
Brazing, soldering, or welding equipment.	5.10.1	✓
Fugitive emissions sources associated with exempt equipment.	5.10.3	✓
Equipment used to compress natural gas.	5.10.2	✓
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature < 150 F.	5.7.4	✓
Containers used to store unheated organic material with an initial boiling point ≥ 302 F.	5.7.5	✓
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥ 0.9042 .	5.7.6	✓
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251 .	5.7.7	✓
Containers used to store refined lubricating oils.	5.7.8	✓

Exemption Category	Rule 2020 Citation	✓
Unvented pressure vessels used exclusively to store liquefied gases or associated with exempt equipment.	5.7.9 or 5.10.4	✓
Portable tanks used exclusively to store produced fluids for ≤ six months.	5.7.10	
Mobile transport tanks on vehicles for delivery of VOCs.	5.7.11	
Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251.	5.8.1.1	✓
Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762.	5.8.1.2	✓
Equipment used to apply architectural coatings.	5.9.1	✓
Equipment used exclusively for the transfer of refined lubricating oil.	5.8.2	✓
Unheated, non-conveyorized degreasers < 10 ft ² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr evaporative losses.	5.9.2	✓
Pits and Ponds as defined in Rule 1020.	5.10.6	✓
Non-structural repairs & maintenance to permitted equipment.	4.2.6	✓
Emissions less than 2 lb/day from units not included above.	4.2.1	✓

ATTACHMENT C

PERMITS TO OPERATE (PTOs)

ATTACHMENT D

463.2 SIP DISTRICT RULE / 4623 DISTRICT RULE COMPARISON

	4623 SJVUAPCD	463.2 old SIP Rule
EXEMPTIONS		
<p>The requirements of this rule shall not apply to ;</p> <p>For any tank designated for emergency standby, in existence prior to May 1, 1979, and which stores exclusively petroleum distillate or crude oil. Prior to return to emergency standby status, each tank shall be thoroughly drained. Each use of the tank shall not exceed 30 days. After a tank has been used (filled or partially filled) and draining of the tank has begun, any further filling of the tank shall constitute a separate use of the tank. The tank shall be equipped with a pressure relief device set to within ten (10) percent of the maximum allowable working pressure of the tank.</p> <p>If the unit is a tank with a capacity of less than 84,000 gallons or less of a small producer with a daily throughput of less than 6,300 gallons per day, and equipped with a pressure relief device set to within 10 percent of the maximum allowable working pressure of the tank.</p> <p>Temporary tanks, with capacities of 21,000 gallons or less, left on site for six months or less.</p> <p>Tanks, reservoirs or other containers which are pressure vessels maintaining working pressures sufficient at all times to prevent organic liquid loss or VOC loss to the atmosphere.</p> <p>If a new incineration device is required solely to comply with the requirements of this rule for existing tanks such device shall not be subject to the requirements of the New and Modified Stationary Source Review Rule provided the device includes BACT provisions for all air contaminants and the device is under District permit.</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>
REQUIREMENTS		
<p>Liquid stored has a TVP of 11 psia or greater under storage conditions</p> <p>No person shall place, store or hold in any floating roof tank of 19,800 gallons or greater, any organic liquid unless such tank, is equipped with; 1) a floating roof consisting o a pontoon-type or double-deck-type cover, 2) a closure device between the tank shell and roof edge consisting of two seals.</p> <p>Seal designs shall be submitted to the APCO and shall not be installed or used unless they are approved by the APCO as meeting the criteria set forth in the following.</p> <p>Metallic-shoe-type, welded tanks;</p> <p>No gap between the tank and primary seal shall exceed 1 1/2 inches. The cumulative length of all gaps greater than 1/2 inch shall not exceed 10% of the circumference of the tank. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of tank circumference. No continuous gap greater than 1/8 inch shall exceed 10% of the tank circumference.</p> <p>No gap in the secondary seal shall exceed 1/2 inch. The cumulative length of all gaps greater than 1/8 inch shall not exceed 5% of the tank circumference.</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>

<p>If the primary seal is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 24 inches above the stored liquid surface.</p>	✓	✓
<p>If the primary seal is a metallic-shoe-type seal, then the geometry of the shoe shall be such that the maximum gap between the shoe and the tank shell is no greater than double the gap allowed by the seal gap criteria for a length of at least eighteen inches in the vertical plane above the liquid surface.</p>	✓	✓
<p>The secondary seal shall allow easy insertion of probes up to one and one-half (1-1/2) inches in width in order to measure gaps in the primary seal.</p>	✓	✓
<p>Secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal.</p>	✓	✓
<p>Metallic-shoe-type seal, riveted tank; No gap between the tank and primary seal shall exceed 2 1/2 inches. The cumulative length of all gaps greater than 1 1/2 inch shall not exceed 10% of the circumference of the tank. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of tank circumference. No continuous gap greater than 1/8 inch shall exceed 10% of the tank circumference.</p>	✓	✓
<p>No gap in the secondary seal shall exceed 1/2 inch. The cumulative length of all gaps greater than 1/8 inch shall not exceed 5% of the tank circumference.</p>	✓	✓
<p>If the primary seal is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 24 inches above the stored liquid surface. If the primary seal is a metallic-shoe-type seal, then the geometry of the shoe shall be such that the maximum gap between the shoe and the tank shell is no greater than double the gap allowed by the seal gap criteria for a length of at least 18 inches in the vertical plane above the liquid surface.</p>	✓	✓
<p>There shall be no holes or tears in, or openings in the envelope surrounding the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric.</p>	✓	✓
<p>The secondary seal shall allow easy insertion of probes up to one and one-half (2-1/2) inches in width in order to measure gaps in the primary seal.</p>	✓	✓
<p>Secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal.</p>	✓	✓
<p>Resilient torrid type seal; No gap between the tank and primary seal shall exceed 1/2 inches. The cumulative length of all gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. No continuous gap greater than 1/8 inch shall exceed 10% of the tank circumference</p>	✓	✓

No gap in the secondary seal shall exceed 1/2 inch. The cumulative length of all gaps greater than 1/8 inch shall not exceed 5% of the tank circumference.	✓	✓
There shall be no holes or tears in, or openings in the envelope surrounding the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric.	✓	✓
The secondary seal shall allow easy insertion of probes up to one and one-half (1/2) inches in width in order to measure gaps in the primary seal.	✓	✓
Secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal.	✓	✓
The primary seal envelope shall be made available for unobstructed inspection by the APCO on an annual basis at locations selected along its circumference at random by the APCO. In the case of riveted tanks with toroid-type seals, a minimum of 8 locations shall be made available; in other cases a minimum of 4 locations shall be made available. If the APCO suspects a violation may exist the APCO may be necessary to determine the seal condition for its entire circumference.	✓	✓
All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10 percent of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal, or lid. The cover, seal, or lid shall at all times be in a closed position, with no visible gaps and be gas-tight, except when the device or appurtenance is in use. Gas-tight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Emissions from gauging or sampling device covers in excess of this limit shall be considered a leak.	✓	✓
Each roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.	✓	✓
<u>Fixed roof tanks with internal floating roof</u> Liquid stored has a TVP of 11 psia or greater under storage conditions	✓	✓
No person shall place, store or hold in any floating roof tank of 19,800 gallons or greater, any organic liquid, light crude oil or petroleum distillate unless the internal floating roof is equipped with; 1) a floating roof consisting of a pontoon-type or double-deck-type cover, 2) a closure device between the tank shell and roof edge consisting of two seals.	✓	✓
<u>Fixed roof tanks with vapor recovery system</u> No person shall place, store or hold in any floating roof tank of 19,800 gallons or greater, any organic liquid, light crude oil or petroleum distillate unless the tank is equipped with a vapor loss prevention system, consisting of a system capable of collecting all VOC's, and a system for processing and for return to the storage or disposal of VOC's, so as to prevent their emission to the atmosphere at an efficiency of at least 95% by weight.	✓	✓

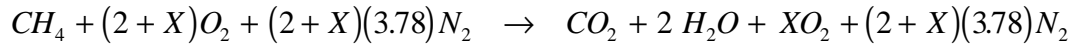
Any tank gauging or sampling device on a tank vented to the vapor recovery shall have gas-tight covers and closed at all times except during gauging or sampling.	✓	✓
All piping, valves and fittings shall be in a gas-tight conditions.	✓	✓
Storage in any above-ground tank of 19,800 gallons or less of gasoline unless tank is equipped with a pressure relief device set to within 10% of the maximum allowable working pressure of the container or is equipped with a vapor loss control device which complies with the requirements of the above rules.	✓	✓
TEST METHODS		
True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100°F true vapor pressure shall be determined by Reid vapor pressure at 100°F and ARB approved calculations.	✓	✓
True vapor pressure of crude oil with an API (American Petroleum Institute) gravity less than 30°, as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990.	✓	✓
Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device.	✓	✓
The efficiency of any VOC destruction device shall be measured by EPA Method 25, 25a, or 25b, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422.	✓	✓
RECORD KEEPING		
Keep an accurate record of liquids stored in each container, storage temperature of the Reid vapor pressure of such liquids.	✓	✓
Emergency standby tanks are exempt from the requirements of the requirements of the rule for floating roof tanks. Records shall be maintained as required by the rule and the date(s) liquid is first introduced to each tank and date(s) tank is fully drained. Such records shall be submitted to the APCO 60 days prior to permit renewal.	✓	✓
for tanks exempt to this rule the owner shall maintain monthly records of average daily throughout and shall submit such information to the APCO 30 day prior to annual permit renewal.	✓	✓

ATTACHMENT E

O₂/CO₂ EXHAUST CONCENTRATIONS FOR STREAMLINED REQUIREMENTS

NATURAL GAS

Maximum PM emissions will occur at 0% O₂ in the exhaust stream and District Rule 4301 requires a 12% CO₂ correction. For natural gas firing units, 0% O₂ occurs at 12% CO₂. This is demonstrated by the following combustion equation for natural gas (wherein X denotes moles of excess air and (neglecting sulfur).



Solving an expression for the fraction of O₂ in the exhaust by volume, wherein the numerator represents the number of moles of CO₂ and the denominator represents the total number of moles of dry exhaust, set equal to 12% CO₂ yields the number of moles of excess air (X).

$$\frac{1}{1 + X + (2 + X)3.78} = 0.12 \Rightarrow X = 0.05$$

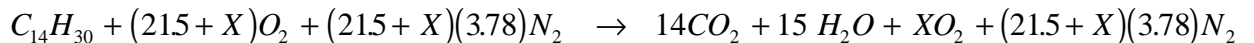
Substituting the coefficients and solving the resultant equation for the fraction of O₂ verifies that 12% CO₂ is equivalent 0% O₂:



$$\frac{0.05}{1 + 0.05 + 7.75} = 0.0057 \approx 0\%$$

FUEL OIL

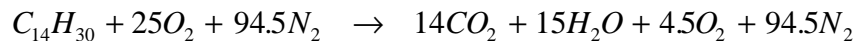
For units burning fuel oil the following combustion equation, wherein X denotes moles of excess air, reveals that 12% CO₂ in the exhaust stream occurs at 4% O₂. Consequently, the compliance of units firing on fuel oil is shown using AP42 F factors uncorrected from 0% O₂ to illustrate the worst case scenario.



Solving an expression for the fraction of O₂ in the exhaust by volume, wherein the numerator represents the number of moles of CO₂ and the denominator represents the total number of moles of dry exhaust, set equal to 12% CO₂ yields the number of moles of excess air (X).

$$\frac{14}{14 + X + (215 + X)3.78} = 0.12 \Rightarrow X = 4.5$$

Substituting the coefficients and solving the resultant equation for the fraction of O₂ in the exhaust verifies that 12% CO₂ is equivalent 4% O₂:



$$\frac{4.5}{14 + 4.5 + 94.5} = 0.039 \approx 4\%$$

ATTACHMENT F

EPA COMMENTS / DISTRICT RESPONSE

EPA COMMENTS / DISTRICT RESPONSE

The following EPA comments were received regarding the proposed Title V Operating Permit for Occidental of Elk Hills - Light Oil Western Oilfields (District facility #S-382). These comments are encapsulated below followed by the District's response. A copy of the EPA 2/16/2001 comment letter is available at the District.

1. EPA COMMENT – Internal Combustion Engines

- A. We recommend deleting the extraneous language stating that the source shall multiply its source testing results by an “ appropriate factor.” The source test results from the testing method and testing period required must be used without adjusting the results.

DISTRICT RESPONSE

The District will delete the following sentence from the requirements of units 32, 62, 63, 670, 671 and 672:

“This mean shall be multiplied by the appropriate factor to determine compliance.”

- B. We understand that the District believes that the source's PM₁₀ emissions are significantly below the PM₁₀ emission rates, and we recommend adding this information in the final evaluation to provide a periodic monitoring evaluation.

DISTRICT RESPONSE

Each of these engines is allowed, by NSR review, to emit 3.6 pounds of PM₁₀ per day (.15 lb / hr * 24 hr). The District believes that this small quantity does not justify more stringent monitoring and record keeping than are already on the permit. Furthermore, each of these engines is gas fired, and further monitoring of gas combustion emissions for PM₁₀ is unnecessary per EPA/CAPCOA agreement.

- C. The source should keep records of any fuel-use exceedances at units 670 through 672.

DISTRICT RESPONSE

The District will modify condition 13 of units 670, 671 and 672 from reading:

“Amount of natural gas combusted in this engine shall not exceed 213,360 dscf/day. [District NSR Rule]”

to read:

“Amount of natural gas combusted in this engine shall not exceed 213,360 dscf/day. *Monthly records of fuel use (recorded as a daily average) shall be maintained.* [District Rules 2520, 9.5.4 and NSR]”

2. EPA COMMENT – Flares

- A. If the source can demonstrate that the burn only “high quality gas” at a particular flare (i.e. fuel similar to treated natural gas), the source could monitor the quality of the fuel. Otherwise, the other options referenced in the CAPCOA/CARB/EPA guidelines require inspection via remote viewing or visible emissions viewing as soon as any flaring occurs (tables I.D.1 and I.E.1), with case-specific considerations for remote, unattended oil field flares.

DISTRICT RESPONSE

The District has included, as Attachment H, fuel quality data verifying that the gasses sent to the emergency flares are of high quality (similar to propane, or better). Further monitoring of these emergency flares is not required.

- B. All flares used to comply with fugitive oilfield VOC requirements must comply with 40 CFR 60.18 (District Rule 4403, 5.3.1). Therefore, we recommend adding to the permits the visible emission limits of 60.18(b) and monitoring, as well as the other design and operational requirements.

DISTRICT RESPONSE

These flares have been identified by the facility as not for use as control device for compliance with District Rule 4403, Section 5.3.1 or as a control device for any source subject to NSPS. The District has included a permit condition on each flare permit excluding them from this service.

- C. In addition, the [\[Title V\]](#) permit appears to authorize flares as a control device for emissions from another source, and they may be subject to a NSPS or other control requirements. We are pleased that the District has agreed to determine and add all such requirements that apply to flares at this source.

DISTRICT RESPONSE

Permit unit –74 is allowed to be used as a destruction device only during “breakdown” conditions. The District views this as an emergency device and not a unit in continuous operation (condition 8).

- D. The District has agreed to determine whether fuel gas treatment will be necessary for the gas produced at this source. As noted in the CAPCOA/CARB/EPA guidelines, monitoring is required for fuel gas treatment devices.

DISTRICT RESPONSE

Fuel gas treatment is not performed as part of this operation.

3. EPA COMMENT – NESHAPS at Oil and Natural Gas Production Facilities (MACT)

- A. Occidental has stated that oil storage vessels, gas processing plants, and glycol dehydration units that they own (at sources S-382 and S-2234) are subject to the MACT standard. Therefore, we encourage the District to include as much information about the MACT requirements as possible prior to issuing the final Title V permit for this source [S-382]. For instance, we understand that the facility may already have emissions controls in place for the glycol units.

DISTRICT RESPONSE

The district has included permit conditions in the facility-wide permit (S-382-0) to address future MACT requirements.

- B. We understand that the District intends to require an application from this source by December [2001] to include specific requirements of the MACT in the Title V permit. We concur that you have the authority to require this application, and District Rule 2520, section 13.1.3 requires that sources provide the District with timely information on newly applicable requirements. We recommend that the District require this information and process the significant permit modification as expeditiously as possible.

DISTRICT RESPONSE

The District does require this information and will process the significant permit modification as expeditiously as possible, under the authority of District Rule 2520.

4. EPA COMMENT – Tanks

- A. Most of the tank permits we have reviewed prohibit venting to atmosphere, except in situations authorized by District Rule 1100. We agree that routine venting should not be allowed, but District Rule 1100 is not SIP-approved, and cannot authorize exceedances of federally-enforceable requirements (10,000 ppm leak limit and 95% control requirement).

DISTRICT RESPONSE

The District will remove references in tank permits to venting as allowed under District Rule 1100. It is our understanding that in accordance with District Rule 2520, Section 13.4.2, break down relief provisions of Rule 1100 apply to all permit conditions, whether or not these provisions are specified in the Title V permit.

- B. Many of the permits contain set point limits on pressure relief hatches, and lower activation pressures for vapor recovery systems. We concur with this approach, and strongly believe that these conditions ensure that the vapor recovery systems are operated to meet the limits specified in the permits. Examples of tank permits that should have pressure settings listed for the vapor recovery (and in some cases the pressure relief valves) so that it will activate before any emissions are released to the atmosphere are: tank numbered between 76 and 104...and the other tanks that share a common vapor recovery system....

DISTRICT RESPONSE

Conditions 63 and 64 of the facility wide permit already address this requirement. Further annotation on each permit would be redundant and unnecessary.

- C. We would like to point out that EPA's Method 21 does not allow sources to take measurements one centimeter from a potential leak point on a tank. Instead, the source must measure at the potential leak source. In particular, all tanks subject to NSPS Kb must meet this stricter federal requirement in stead of the less strict District rule.

DISTRICT RESPONSE

The District will revise conditions for any tank leak testing performed pursuant to NSPS standards to ensure that testing is performed in accordance with EPA Method 21.

- D. In addition, sources subject to [40 CFR 60, subpart] Ka are subject to initial reporting under 60.113(a)(2) that includes information that will be helpful for determining proper operating conditions and monitoring requirements for the final permits.

DISTRICT RESPONSE

The District could not find your reference, 60.113(a)(2), in 40 CFR. The District did find 40 CFR 60.113a(a)(2):

"The owner or operator of each storage vessel to which this subpart applies which has a vapor recovery and return or disposal system shall provide the following

information to the Administrator on or before the date on which construction of the storage vessel commences:...”

Since this affected facility is an existing source, the District feels that this section does not apply. Furthermore, compliance with the applicable sections of Ka will be assured by the conditions included in the Title V operating permit.

5. EPA COMMENT – Glycol Regeneration Units

We recommend that the District include a periodic monitoring evaluation of all the hourly VOC limits that are listed in the permit. In particular, the periodic monitoring evaluation does not address whether glycol treatment units (which may emit mostly benzene) have demonstrated compliance with their hourly VOC limits....

DISTRICT RESPONSE

Hourly VOC emissions listed on permits are post-combustion emissions. Other emissions are based upon AP-42, GlyCalc and component counts. Since they are based upon calculations, further monitoring is not necessary. The District agrees that this facility will be subject to MACT standards, and expects the facility to comply with those requirements in a timely manner.

ATTACHMENT G

PUBLIC COMMENTS / DISTRICT RESPONSE

PUBLIC COMMENT / DISTRICT RESPONSE

Public comments were received from Occidental of Elk Hills (OEHI) regarding the proposed Title V Operating Permit for their Light Oil Western Oilfields (District facility #S-382). These comments are encapsulated below followed by the District's response. A copy of Occidental of Elk Hills' 1/31/2001 comment letter is available at the District.

1. OEHI COMMENT — FUGITIVE I&M REQUIREMENTS FOR OIL STORAGE / PROCESSING TANKS

- A. To ensure compliance with the phrase "gas tight", which in some cases is required by underlying new source review (NSR) or Rule 4623 requirements, fugitive inspection and maintenance (I&M) procedures have been included in many permits. The proposed requirements are modeled after Rule 4403. However, Rule 4403 excludes from inspection those components identified in service under section 4.0. These exceptions should also be included in permit conditions requiring I&M, which are imposed under Rule 2520.

DISTRICT RESPONSE

Permits with conditions referencing District Rule 2520, containing similarities to District Rule 4403 and District Rule 4623, have already been modified to grant as many similar allowances, found in District Rule 4403 and District Rule 4623, as possible.

- B. The District has included wording in the conditions on some permits to include Rule 4403 exceptions discussed above. However, the exceptions were included in the permit conditions for the majority of the tank permits. OEHI again requests that the Facility Wide permit (unit -0) and all permits for equipment, wherein the District has imposed I&M requirements under Rule 2520 be revised to include a condition stating that components qualifying for an I&M allowance, as specified in Rule 4403, sections 4.1 and 4.2, are excluded from components requiring inspection.

DISTRICT RESPONSE

Permits with conditions referencing District Rule 2520, containing similarities to District Rule 4403 and District Rule 4623, shall be modified to grant as many similar allowances, found in District Rule 4403 and District Rule 4623, as possible.

2. OEHI COMMENT — I&M REQUIREMENTS FOR DRAIN TANKS

Permit conditions proposed by the District subject many small drain tanks to I&M requirements. However, with the exception of one tank (unit -385), none of these tanks are served by vapor recovery systems (VRS) and none of these tanks are subject to Rule 4623 VRS control requirements. Furthermore, the tanks were grandfathered into the permit system and are not subject to NSR emission limitations. Some of the tank permits do include a condition stating that the tanks must be maintained in a “gas tight” condition. However, the permit condition is not an applicable requirement:

- a. The condition is not required for ensuring compliance with a rule contained in the applicable implementation plan. The tanks are not subject to Rule 4623 requirements to be maintained in a “gas tight” condition because they are less than 471 barrels capacity and are exempt from control requirements.
- b. The permit condition is not derived from the District’s NSR rule since the permits were grandfathered.

The District has invoked Rule 2520 to justify inclusion of many of these conditions. However, the authority granted by Rule 2520 is limited to imposing conditions necessary for ensuring compliance with applicable requirements. Please delete the I&M requirements on these permits. OEHI also request that the District make sure the conditions on the permit are not inadvertently designated as being “federally enforceable”.

DISTRICT RESPONSE

All of the permit units in the supplied list were either equipped with or associated with a vapor recovery system (VRS). For clarity, the District will remove the conditions from all but the numerically lowest permit unit associated with a given VRS (recognizing that each permit unit associated with a vapor recovery system is still subject to the leak prevention requirements on the “main” permit).

3. OEHI COMMENT — FUEL SULFUR TESTING REQUIREMENTS

- A. OEHI previously requested that the District extend the reference test methods for determining fuel sulfur to include total sulfur by gas chromatography (GC analysis). OEHI again requests that permit conditions requiring the testing of fuel sulfur for equipment such as engines, boilers, heaters, and flares be revised as follows:

“...shall be determined using ASTM method D 1072-80, D 3031-81, D 4084-82 or D 3246-81 or by grab or by continuous GC analysis (on a daily average basis) using GC-FPD/TCD/FID performed in the laboratory.”

OEHI is again requesting that the District revise the proposed permit condition to extend the allowable reference test methods.

DISTRICT RESPONSE

The District will include the requested test methods.

- B. OEHI also requests that the District allow annual testing after eight consecutive tests show compliance with fuel sulfur limits. Please revise the proposed conditions on the following permits: -32, -62, -63, -69, -71, -74, -409, -410, -411, OEHI identified permit group 32, -670, -671, -672, -675 through -681.

DISTRICT RESPONSE

The EPA has accepted quarterly testing of non-certified fuel after eight successful consecutive weekly tests as adequate for compliance. OEHI has applied for, and received, permit template SJV-IC-3-0 for many of the units listed above. Quarterly testing of non-certified fuel after eight successful consecutive weekly tests is a permit template condition and will not be revised. Since the condition is accepted by the EPA as adequate demonstration of compliance, it has also been included on the units not requesting this permit template.

4. OEHI COMMENT — TEST REQUIREMENTS FOR CRUDE OIL LOADING RACKS

As explained in OEHI's comments on the gas plant Title V permit (facility S-2234), the specified test method applies to gasoline bulk loading facilities where gasoline is received from pipelines, ships and barges. The test method requires loading be conducted over a continuous six-hour period or requires testing over several days. The test procedure will not work with intermittently operated oilfield truck loading facilities.

OEHI again requests that all permit conditions referencing 40 CFR 60.503 be modified to include a provision, allowing the use of alternate test method, subject to the condition that the company prepare and obtain approval of a source test plan, as shown below:

"VOC emissions from the vapor collection and control system shall be determined using 40 CFR 60.503 "Test methods and procedures" and EPA Methods 2A, 2B, 25A, 25B, and ARB 432, or ARB method 2-4. Alternate test methods and procedures may be used, provided the initial compliance determination is conducted in accordance with a source test plan approved by the APCO outlining the test method."

DISTRICT RESPONSE

The test method listed is specified by applicable District rule. Therefore, the test method cannot be modified or removed from the requirements of these permit units.

ATTACHMENT H

GAS ANALYSIS FOR FUEL TO EMERGENCY FLARES

ATTACHMENT I

PSD PERMIT

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit
District Facility No. S-382
Project Number 970330**

Dear Mr. Rios:

The District has issued the Final Title V Permit for Occidental of Elk Hills. The preliminary decision for this project was made on December 27, 2000. A summary of the comments and the District's response to each comment is included as an attachment to this letter.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us and we appreciate your concurrence with this action. Should you have any questions, please contact Mr. Richard McVaigh at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

Enclosure(s)
C: Douglas Shaffer, Permit Services Engineer

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
2020 L St.
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit
District Facility No. S-382
Project Number 970330**

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for Occidental of Elk Hills. The preliminary decision for this project was made on December 27, 2000. A summary of the comments and the District's response to each comment is included as an attachment to this letter.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Richard McVaigh at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

Enclosure(s)
C: Douglas Shaffer, Permit Services Engineer

Dennis J. Champion, PE
Occidental of Elk Hills
PO Box 1001
Tupman, CA 93276

**Re: Notice of Final Action - Title V Permit
District Facility No. S-382
Project Number 970330**

Dear Mr. Champion:

The District has issued the Final Title V Permit for Occidental of Elk Hills. The preliminary decision for this project was made on December 27, 2000. A summary of the comments and the District's response to each comment is included as an attachment to this letter.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Richard McVaigh at (559) 230-5900.

Sincerely,

Sayed Sadredin
Director of Permit Services

Enclosure(s)
C: Douglas Shaffer, Permit Services Engineer

Bakersfield Californian

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT
NOTICE OF FINAL DECISION TO ISSUE
FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the initial Federally Mandated Operating Permit to Occidental of Elk Hills for its light oil and natural gas production located west of Interstate 5 in Kern County, California.

The District's analysis of the legal and factual basis for this proposed action, project #970330, is available for public inspection at the District office at the address below. For additional information regarding this matter, please contact Rick McVaigh, Permit Services Manager, at (559) 230-5900, or contact Seyed Sadredin, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

Title V PUBLIC NOTICE CHECKLIST

FACILITY ID/NAME: S-382/Occidental of Elk Hills

PROJECT #: 970330

√ √
REQST. COMPL.

___ ___ Title V PRELIMINARY PUBLIC NOTICE
___ ___ Title V REVISED PROPOSED PUBLIC NOTICE
√ ___ Title V FINAL PUBLIC NOTICE
___ ___ Title V MODIFICATION PUBLIC NOTICE

ENCLOSED DOCUMENTS REQUIRE:

√ ___ Stamp current date on all letters and signature page of the evaluation.

√ ___ Send **FINAL** notice letters to CARB, EPA and applicant including the following attachments:
 √ Engineering evaluation, public notice, permits.
 ___ Other

√ ___ Send **FINAL** public notice for publication to: Bakersfield Californian.

√ ___ Send signed copies of **FINAL** notice letters to Regional Office, Attention:
 Douglas Shaffer.

√ ___ Enter "Mail Date" onto project record.

___ ___ Attach Compliance Assistance Bulletin "Title V Reporting Requirements" to the facility mailing.

___ ___ Other special instructions: _____

Date completed: August 14, 2001 By: Douglas Shaffer

San Joaquin Valley Air Pollution Control District

Final Engineering Evaluation

Facility No. S-382
Occidental of Elk Hills, Light Oil Western

PREPARED BY:

Douglas Shaffer
Air Quality Engineer

REVIEWED BY:

Rick McVaigh
Permit Services Manager

APPROVED BY:

Seyed Sadredin
Director of Permit Services

PRELIMINARY DECISION DATE: _____